UNIFIED STATE PLAN

FOR

THE WORKFORCE INNOVATION

AND

OPPORTUNITY ACT OF 2014

TERRITORY OF THE VIRGIN ISLANDS

OF THE UNITED STATES

FOR THE PERIOD OF

JULY 1, 2016 – JUNE 30, 2019
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Overview

The Workforce Innovation and Opportunity Act of 2014 provides a unique platform to transform the structure of the Virgin Islands Workforce System from that of a static inflexible and unrelated set of job training programs to a diverse customer centered work preparedness system. By developing sector strategies in industries currently in demand in the Territory such as Hospitality, Information Technology, Construction and Healthcare and expanding to emerging sectors such as the Marine trades, Green Energy, Aviation and Financial Services, the new workforce system’s focus is on aligning skilled workers with stable to growing industries.

However, the growth of the Virgin Islands’ workforce is caught between the familiarity of and reliance on a structure characterized by varied levels of low-moderate skilled, low-moderate wage, long-term employment; and the emergence of a fast paced, highly skilled, technology-based global economy.

In order to address the changing dynamics of the workplace causative factors have been identified and must be addressed. These factors include:

- Rising global and regional competitiveness;
- A workforce with misaligned skill sets for current job demand;
- An aging population and workforce;
- A contracting economy;
- Declining private and public capital resources and fiscal constraints.

Solutions to these issues must be decisive and sustainable over time. They must be built into the fabric of the workforce system through partnerships with agencies, business and community stakeholders. The overarching strategy includes elements that provide consistency such as:

- Aligning workforce resources with existing high demand sectors;
- Engaging emerging sectors in developmental activities from the ground floor;
- Aligning the activities of key economic development and workforce development stakeholders;
- Collaboration with workforce agencies to leverage resources and reduce delivery costs;
- Development of quantitative evaluation systems to track return on investment.

At the center of a vibrant economy is a dynamic and prosperous workforce fueled by sector job demand over a given time period. To achieve equilibrium of job demand and supply the Virgin Islands must use innovative strategies that can be quickly changed, amended and pursued. The traditional business cycle no longer conforms to a structured time frame but rapidly moves as producer and consumer demands fluctuate and local and global supply chain transition. The Virgin Islands’ workforce development vision seeks to pave the way towards enhancing the
labor market and community with a flexible system for enhancing skills and promoting entrepreneurial opportunity through a seamless system of pooled economic resources at the employer and jobseeker level. All services and strategies are designed to meet the needs of all jobseeker customers including those with barriers to employment; specifically, out-of-school youth, veterans, individuals with disabilities and the long-term unemployed.

Innovating and implementing a New Model for workforce development and economic development to attain the goals of a long-term vision for prosperity is a journey. Along the way engaged leadership is required to maintain the vision, prioritize demands on the system and successfully meet the inevitable challenges that will occur. Signs of progress should be evident and encouraging. Engaged stakeholders sharing a common vision and action plan generate aligned decisions and measured accountability.
I. WIOA STATE PLAN TYPE

The US Virgin Islands has selected to submit a Unified State Plan which covers the six (6) required programs and are administered locally by three (3) separate agencies.

| Virgin Islands Department of Labor (Titles I and III) | • Adult, Dislocated Workers, Youth  
| • Wagner-Peyser |
| Virgin Islands Department of Education (Title II) | • Adult Education and Family Literacy Act |
| Virgin Islands Department of Human Services (Title IV) | • Vocational Rehabilitation |

The Virgin Islands Workforce Development Planning team is comprised of representatives from the Departments of Labor, Education and Human Services as provided by the four WIOA Core programs. Representatives of TANF, SNAP, Career & Technical Education and Paternity and Child Support also participated in the coordination and program alignment discussions. The vision for the system was developed by the Workforce Development Board in conjunction with the Economic Development Authority, the University of the Virgin Islands, the University’s Research and Technology Park and sector stakeholders from the business community.

II. STRATEGIC ELEMENTS

(a) Economic, Workforce, and Workforce Development Activities Analysis

Economic and Workforce Analysis

(A) Economic Analysis

The current economic conditions of the Virgin Islands economy reflected overall contraction in total output measured by the gross domestic product (GDP). Aggregate demand (measured in chained dollars, which are adjusted for inflation) decreased by 0.6 percent (see table 1)\(^1\). The change was primarily due to reduction in federal government spending with lower compensation to employees and in lower construction activity. The overall decline was at a much slower rate than in the previous three cycles, with 2012 reflecting the steepest decline of -15.0 percent due to

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reduction in the goods producing sector, specifically petroleum products, but slightly offset with minor upticks in the service producing sector primarily driven by tourist related spending and related activity.

Table 1

Over the year, exports of goods increased (primarily in petroleum), but were offset by imports of petroleum products which counterbalanced growth. Although there was a slight increase, the dollar value was down significantly compared to years prior to 2012 (see Table 2). The export of services, which are connected to tourist spending activities, saw an increase, supported by data of visitor arrivals at air and sea ports. The primary or top tier sectors that contributed to output, or the value added component were the service producing sector (hotel accommodations, retail trade, food services establishments), other services (health care, transportation, educational, and professional), and the Territorial government.

Table 2

Another component of measuring output is the compensation of employees, or simply labor, and in turn how those dollars are spent through consumption of goods and services within the

---

2 Data source from U.S. Bureau of Economic Analysis Table 1.2 Real GDP (Chained) line 17 and 20 respectively.
economy. Based on the data released, the service producing sector, followed by other services, and local government were major components of the $1.8b total compensation of 2013.

The Virgin Islands’ economy has shifted the majority of its output in the service producing sectors, with the tourist related industries leading and local serving or indirect sectors also contributing to productivity. In addition, public sector both at the local and federal level also contributes approximately 20 percent of the gross domestic product of the area.

**Labor Supply and Demand**

Despite the slowdown in the pace of the Territory’s output declining, employment creation still lags with declines offset by minimal growth in occupations over the period. This is most evident over a five year cycle when employment peaked at 45.1k in Nov 2010 and falling too roughly 37.5k in January 2014 (see table 3). This shift occurred in all sectors, but the goods producing sector experienced the most significant impact in terms of job loss, government revenues, and slow- down in all facets of economic outputs. This shift has also skewed the labor force and resulted in contraction as the number of persons in the pool have decreased, and out of those in the pool a significant amount are unemployed. The unemployed factor is twofold and based on the low number of job vacancy compared to prior periods, and also the mismatch of current occupational job requirement compared to skill level and qualification of the labor pool currently in the Virgin Islands.

During 2015, the average estimated number of unemployed was 5,824, and the entire labor pool (population 16 years plus which form the potential labor pool) averaged 48,525.

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**Table 3**

<table>
<thead>
<tr>
<th>Month</th>
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<tbody>
<tr>
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<tr>
<td>Apr 2010</td>
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<tr>
<td>Jul 2010</td>
<td>45.1</td>
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<tr>
<td>Oct 2010</td>
<td>45.1</td>
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<tr>
<td>Jan 2011</td>
<td>45.1</td>
</tr>
<tr>
<td>Apr 2011</td>
<td>45.1</td>
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<tr>
<td>Jul 2011</td>
<td>45.1</td>
</tr>
<tr>
<td>Oct 2011</td>
<td>45.1</td>
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<tr>
<td>Jan 2012</td>
<td>45.1</td>
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<td>Apr 2012</td>
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<td>Jul 2012</td>
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<td>Oct 2012</td>
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<tr>
<td>Jan 2013</td>
<td>45.1</td>
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<td>Apr 2013</td>
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<tr>
<td>Jul 2013</td>
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<tr>
<td>Oct 2013</td>
<td>45.1</td>
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<tr>
<td>Jan 2014</td>
<td>45.1</td>
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<tr>
<td>Apr 2014</td>
<td>45.1</td>
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<tr>
<td>Jul 2014</td>
<td>45.1</td>
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<tr>
<td>Oct 2014</td>
<td>45.1</td>
</tr>
<tr>
<td>Jan 2015</td>
<td>45.1</td>
</tr>
<tr>
<td>Apr 2015</td>
<td>45.1</td>
</tr>
<tr>
<td>Jul 2015</td>
<td>45.1</td>
</tr>
<tr>
<td>Oct 2015</td>
<td>45.1</td>
</tr>
<tr>
<td>Nov 2015</td>
<td>37.3</td>
</tr>
</tbody>
</table>

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The lag in job growth is most evident in the posting of job openings throughout the Virgin Islands. In 2010, announced job vacancies were 5,241 and fell to approximately 2,522 at the end of 2014 a 51.8% decline signifying the contraction and shift in economic activity. Currently, job demand activity has been centered on the continued seasonal economic patterns of the sectors with short term construction jobs, and service sector jobs in the leisure and hospitality as the primary sectors creating employment.

Present Industry and Occupational Sector

At the industry level, the service producing sectors, lead the field during the 2014 cycle, with the majority covering the accommodation, food services, construction, and retail trade. Of the 2,522 listings, (565) or 22.27% came in the accommodation sector related to seasonal employment from tourist related commerce. Other sectors announcing job openings were public, admin/support services, retail merchandising, food services, nursing and residential care facilities, and telecommunications.
The top occupations in the current labor market are primarily in the protective service, construction/laborers, stock clerks, sales person, and nursing. Other occupations were in demand during the period, but were not heavily concentrated or in great demand. Midyear openings were still related to service sector occupations, and included electricians, masons, housekeeping, nurses, and retail sales persons to name a few. At the lower end, some the scientific and technical skills occupations that were available were computer specialist, counselors, paralegals, and teachers.
Table 6

<table>
<thead>
<tr>
<th>Occupation</th>
<th>Positions</th>
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<tbody>
<tr>
<td>Security Guards</td>
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<tr>
<td>Construction Laborers</td>
<td>60</td>
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<tr>
<td>Customer Service Representatives</td>
<td>36</td>
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<tr>
<td>Stock Clerks and Order Filling</td>
<td>14</td>
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<tr>
<td>Cashiers</td>
<td>62</td>
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<tr>
<td>Waiters and Waitresses</td>
<td>54</td>
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<tr>
<td>Registered Nurses</td>
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<tr>
<td>Hotel, Motel, and Resort Desk Clerks</td>
<td>9</td>
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<tr>
<td>Carpenters</td>
<td>9</td>
</tr>
<tr>
<td>Helpers-Carpenters</td>
<td>10</td>
</tr>
<tr>
<td>Maids and Housekeeping Cleaners</td>
<td>49</td>
</tr>
<tr>
<td>Cooks, Restaurant</td>
<td>47</td>
</tr>
<tr>
<td>Food Servers, Nonrestaurant</td>
<td>18</td>
</tr>
<tr>
<td>Janitors and Cleaners, Except Maids and Housekeep</td>
<td>9</td>
</tr>
<tr>
<td>Bartenders</td>
<td>14</td>
</tr>
<tr>
<td>Reinforcing Iron and Rebar Workers</td>
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</tr>
<tr>
<td>Accountants and Auditors</td>
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</tr>
<tr>
<td>Nursing Assistants</td>
<td>9</td>
</tr>
<tr>
<td>Medical Assistants</td>
<td>3</td>
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<tr>
<td>Cement Masons and Concrete Finishers</td>
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<tr>
<td>First-Line Supervisors/Managers of Food Preparato</td>
<td>29</td>
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<tr>
<td>Food Preparation &amp; Serving Related Workers, Other</td>
<td>29</td>
</tr>
<tr>
<td>Laborers &amp; Freight, Stock &amp; Material Movers, Hand</td>
<td>24</td>
</tr>
<tr>
<td>Community and Social Service Specialists, Other</td>
<td>25</td>
</tr>
<tr>
<td>Electricians</td>
<td>14</td>
</tr>
<tr>
<td>Maintenance and Repair Workers, General</td>
<td>25</td>
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<tr>
<td>Amusement and Recreation Attendants</td>
<td>25</td>
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<tr>
<td>Dishwashers</td>
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<tr>
<td>Managers, All Other</td>
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<tr>
<td>Retail Salespersons</td>
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<tr>
<td>Sales Representatives, Services, All Other</td>
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<tr>
<td>Baggage Porters and Bellhops</td>
<td>27</td>
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<tr>
<td>Gaming Dealers</td>
<td>24</td>
</tr>
<tr>
<td>Secretaries, Except Legal, Medical, and Executive</td>
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<tr>
<td>Chefs and Head Cooks</td>
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<tr>
<td>Bookkeeping, Accounting, and Auditing Clerks</td>
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<tr>
<td>Operating Engineers and Other Construction Equipme</td>
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<tr>
<td>Reservation and Transportation Ticket Agents and T</td>
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<tr>
<td>Receptionists and Information Clerks</td>
<td>16</td>
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<tr>
<td>Cargo and Freight Agents</td>
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<tr>
<td>Dining Room and Cafeteria Attendants and Bartender</td>
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<tr>
<td>Host &amp; Hostess, Restaurant, Lounge &amp; Coffee Shop</td>
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<tr>
<td>Office and Administrative Support Workers, Other</td>
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<tr>
<td>Preschool Teachers, Except Special Education</td>
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<td>Property, Real Estate &amp; Community Association Mgr</td>
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<td>Food Service Managers</td>
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<td>Installation, Maintenance &amp; Repair Workers, Other</td>
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<td>Marketing Managers</td>
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<td>Brickmasons and Blockmasons</td>
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<tr>
<td>Health Technologists and Technicians, All Other</td>
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<td>Sales and Related Workers, All Other</td>
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<tr>
<td>Cooks, All Other</td>
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<td>Credit Analysts</td>
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<td>Executive Secretaries &amp; Administrative Assistants</td>
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<td>First-Line Supervisors/Managers of Construction Tr</td>
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</tr>
<tr>
<td>Physicians and Surgeons, All Other</td>
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<tr>
<td>Power Plant Operators</td>
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<td>Sales Managers</td>
<td>14</td>
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<tr>
<td>Software Developers, Applications</td>
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<td>Human Resources Assistants, Except Payroll and Tim</td>
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<td>Metal Workers and Plastic Workers, All Other</td>
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<td>Producers and Directors</td>
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<td>Anthropologists and Archeologists</td>
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<td>Butchers and Meat Cutters</td>
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<tr>
<td>Computer Network Support Specialists</td>
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<tr>
<td>Food Preparation Workers</td>
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</table>

To get an overall picture of the entire labor market vacancy an inverted occupational matrix analysis provides detail and concentration of the sectors demand, and further drills down into where occupations are located. Table 7 illustrates (filtered down to 10 plus positions) the cross section for the year and provides the counts of positions listed as vacant. The accommodation, and administrative /support services sector listed the highest, while construction and retail stores trailed with the higher concentration of job openings. Within those sectors security guard jobs
ranked the highest followed by stock clerks, nurses, store clerks and customer service representatives.

Table 7

<table>
<thead>
<tr>
<th>Category</th>
<th>Percent of Positions</th>
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<tbody>
<tr>
<td>Accommodation</td>
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<tr>
<td>Caterers</td>
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<tr>
<td>Clerks and Food Chefs</td>
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<td>Cooks, Restaurant</td>
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<tr>
<td>Bakers</td>
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<tr>
<td>Food Managers and Food Preparation</td>
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<tr>
<td>Food Servers, Restaurants</td>
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</tr>
<tr>
<td>Hotel, Motel, and Resort Clerk Chefs</td>
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<tr>
<td>Linen and Cheese, Dairy, Eggs and Cheese</td>
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</tr>
<tr>
<td>Waste and Incinerating Services</td>
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<tr>
<td>Marketing Managers</td>
<td>10</td>
</tr>
<tr>
<td>Sales Representatives, Services, All Other</td>
<td>18</td>
</tr>
<tr>
<td>Travelers and Tourists</td>
<td>18</td>
</tr>
<tr>
<td>Administrative and Support Services</td>
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<tr>
<td>Cargo and Freight Agents</td>
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<tr>
<td>Customer Service Representatives</td>
<td>18</td>
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<tr>
<td>Reservation and Transportation Ticket Agents and T</td>
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<tr>
<td>Security Guards</td>
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<tr>
<td>Armament, Guarding &amp; Repairingradio</td>
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<tr>
<td>Demolition &amp; Tobacco Products, Marshal</td>
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<tr>
<td>Security Guards</td>
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<tr>
<td>Construction</td>
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<td>Carpenters</td>
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<tr>
<td>Cement Masons and Concrete Finishers</td>
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<td>Construction Laborers</td>
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<td>Helpers, Carpenters</td>
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<td>Refinishing and Repair Workers</td>
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<td>Construction of Buildings</td>
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<td>Building Contractors</td>
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<td>First Line Supervisors of Construction Tr</td>
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<td>Helpers, Carpenters</td>
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<td>Credit Intermediation &amp; Related Activity</td>
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<td>Credit Ratings</td>
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<td>Customer Service Representatives</td>
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<td>Banking, Legislation, &amp; Government</td>
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<tr>
<td>Medical Officers</td>
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<td>Physicians/Doctors, All Other</td>
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<td>General Services</td>
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<td>Health and Personal Care Services</td>
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<td>Health and Residential Care Facilities</td>
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<td>Community and Social Service Specialists, Other</td>
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<td>Nursing Standards</td>
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<td>Professional and Technical Services</td>
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<td>Journeymen and Apprentices</td>
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**Emerging Sectors and Occupations**

The Virgin Islands employment needs are currently focused on the service industry, however, looking forward, recent policy reviving marine and yachts berthing, infrastructure investment in telecommunications technology, and entrance into petroleum storage will provide initial
expansion in occupations under the professional, science, mechanical engineering, and support services along with the current bellwether sectors related to tourism and retail trade.

In the short term, occupational projections for job openings are expected from a replacement factor compared to growth. Job openings are measured by two major components growth and replacement factors. Growth represents openings due to expansion, compared to replacement openings which are created by retirement, transfer to other occupations, seasonal temporary employment factors, and disability.

89.3% of the job openings are expected from a replacement factor, approximating 1,737 with the remaining 209 attributed to growth. These replacement jobs are primarily part of the leisure and hospitality sectors with sales related, office and administrative, transportation, protective services, and laborers, representing the majority. Other occupations that represent a smaller proportion of the replacement factor are repair technicians, construction, social science, education, health care, and financial occupations. Occupations expected to see some growth are teaching, nursing, administrative and secretarial, and construction laborers. The occupations by growth and replacement factors counts can be seen in below in Table 8.

Table 8
Credentials and Licenses
According to the 2013 Community Survey conducted by the University of the Virgin Islands Eastern Caribbean Center, just over one-third or 36% of the Territory’s workforce population (aged 16+) have a high school diploma but have no post-secondary degree. Twenty (20%) percent have some college or an Associate degree; while fourteen (14%) percent have a Bachelor’s and six (6%) percent have a Graduate degree. With the projected job openings over the next five to seven years showing Office and Administrative Support as a leading occupational area and Sales and Related areas in the top three, there exists a growing need for more individuals to attain AA or BA degrees in Business Management/Administration or at least professional Program Certificates in the Hospitality, Retail or General Administrative areas.

Food Preparation and Serving Related occupations also rank high in consistent employment currently and in the long term. Credentials in Food and Beverage management are layered by skill level and now required as competition to secure employment in these areas grows. Healthcare Practitioners and Technical Operations continue to show a slow steady rise over the time and as the Territory’s population continues to age the demand for certified home health care aides, healthcare technicians, and certified/dgreed healthcare management and administrative personnel increase.

As part of its strategy to increase the number of qualified and certified workers in the Territory, in addition to traditional classroom education and training the Virgin Islands Workforce System will roll out alternative education and training opportunities via online distance learning and competency based learning formats to ensure that job seekers at all levels of the education spectrum have the opportunity to receive training that allows them to compete for locally in-demand jobs. Employers have consistently expressed a willingness to work with individuals who attain basic or entry level certification in these occupations to take them to an advanced level through on-the-job training apprenticeships or other work based learning options.

(B) Workforce Analysis

Employment and Unemployment
The unemployment rate in calendar year 2015 continued at double digit based on the shock wave that completely impacted the entire civilian labor force in 2012. Although, still high based on the contraction, the unemployment rate has decreased from a high of 13.9% in September 2013 based on individuals exiting the labor force through voluntary and involuntary unemployment and weak job opening compared to the potential supply. Despite the unemployment rates decreasing, the levels of employment are still low compared to prior year data, this is primarily based on the weak job demand, and persons who are marginally or completely detached (persons in this category are not counted in the unemployment since they have not been looking for work for an extended period of time, or work has not been available in the market) from the labor
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market. Employment averaged 48.5k in 2015, of that number employment was 42.7k and the mean unemployment was 5.8k.

Approximately 1,977 individuals were served in PY 2014 into PY 2015 by the Virgin Islands Workforce System. Fifty-three point five percent (53.5%) were in employment service and 46.5% under workforce investment activities. Of the population served and looking at the participants in age strata, the larger majority were 31 years of age and older (see table 9) at 51.39% and at the lower end 19.07% were youth participants.

Table 9

<table>
<thead>
<tr>
<th>Age At Participation</th>
<th>Gender</th>
<th>Employed</th>
<th>Employed but Received Notice of Term.</th>
<th>Not Employed</th>
</tr>
</thead>
<tbody>
<tr>
<td>14 - 21</td>
<td>Female</td>
<td>1471</td>
<td>2014</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22 - 30</td>
<td>Female</td>
<td></td>
<td>3718</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td>2910</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Rote</td>
<td>20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>31 and Older</td>
<td>Female</td>
<td></td>
<td>420</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Rote</td>
<td>63</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

On the gender descriptor, the overwhelming number was female participants in each age cohort. Another measure of the jobseekers that were served in the system was employment status at participation.

Table 10

<table>
<thead>
<tr>
<th>Age At Participation</th>
<th>Employed</th>
<th>Employed but Received Notice of Term.</th>
<th>Not Employed</th>
</tr>
</thead>
<tbody>
<tr>
<td>14 - 21</td>
<td>2.88%</td>
<td></td>
<td>16.19%</td>
</tr>
<tr>
<td>22 - 30</td>
<td>9.51%</td>
<td>0.46%</td>
<td>19.58%</td>
</tr>
<tr>
<td>31 and Older</td>
<td>12.59%</td>
<td>1.16%</td>
<td>37.63%</td>
</tr>
</tbody>
</table>

The majority of persons were not employed at the service date (table 10) and also correlated to the count of persons served in the system during the same time period. This data also indicates that the majority of workers in the labor force is roughly 31 years and older and is the higher
concentration or pool of workers employers can find or assess in finding candidates to enter the labor force or focus on training and skill attainment.

**Labor Market Trends**

60.75% of projected openings in the Virgin Islands will require short-term on the job training based on the typical skill sets required for the occupations. The occupations are primarily found in the leisure and hospitality, retail trade, and administrative support sectors. Approximately, 10.03% require moderate on the job training, and apprenticeship requirements are below one percent of the projected openings.

Demand has moved into seasonal employment mainly in the leisure and retail trade sectors. This shift has also changed the dynamic of required skill sets and training that is customarily associated with manufacturing and construction occupations. At one point in the economy, medium to long term training, and apprenticeships were in demand based on the large manufacturing base, but has waned into short and medium term requirements as the service industry has become the dominant sector.

**Education and Skill Levels of the Workforce**

Education and skills levels are critical factors in workforce development continuity and expansion. The Virgin Islands workforce education levels at the end of 2014 reflect the majority of educational skill level at the high school diploma level. The educational attainment level of customers during the PY14/ FY 15 fiscal year can be seen in table 11.

Table 11

<table>
<thead>
<tr>
<th>Education Level</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 9th grade</td>
<td>3.5%</td>
</tr>
<tr>
<td>9th grade</td>
<td>2.0%</td>
</tr>
<tr>
<td>10th grade</td>
<td>2.3%</td>
</tr>
<tr>
<td>11th grade</td>
<td>2.3%</td>
</tr>
<tr>
<td>12th grade</td>
<td>8.6%</td>
</tr>
<tr>
<td>High School Diploma</td>
<td>51.3%</td>
</tr>
<tr>
<td>Some College, No Degree</td>
<td>3.0%</td>
</tr>
<tr>
<td>Associate Degree</td>
<td>11.0%</td>
</tr>
<tr>
<td>Bachelor's Degree</td>
<td>9.0%</td>
</tr>
<tr>
<td>Certificate of Attainment</td>
<td>0.3%</td>
</tr>
<tr>
<td>Education beyond Bachelor</td>
<td>9.2%</td>
</tr>
<tr>
<td>Some College, Associate</td>
<td>1.8%</td>
</tr>
<tr>
<td>Some College, No Degree</td>
<td>0.0%</td>
</tr>
<tr>
<td>High School Diploma</td>
<td>2.3%</td>
</tr>
</tbody>
</table>

Roughly 300 had less than high school completed, and 328 with a Bachelors or higher degrees. Looking at the short term and potentially further out to ten years, and the assumption that there will be no significant economic event or major emerging sector requiring upwards of 2,000 employees, the educational and training needs in the short term 3rd quarter of 2016 require high school diploma and less, representing 80% of the projected openings. The replacement and
growth component of projected potential jobs and the required educational attainment level remains proportionally the same, with 1,378 of the replacements requiring high school diploma or less. 94 required associates and 173 at the bachelor’s level. 128 of the 209 growth occupations require a high school diploma or less, with 35 for bachelors, 12 for associates, and the residual spread among post-secondary or professional post-secondary certificates or licenses.

**Skill Gaps**

The 2015 US Virgin Islands Business and Employer Survey conducted by the VI Bureau of Economic Research states that “essential hard skills deficits in reading, writing and verbal skills (40%); computer technical skills (27%) and math logical reasoning (22%) are most cited as lacking in candidates”. The often stated lack of soft skills is primarily related to customer service (59%), punctuality and reliability (52%), and time management (42%).

Half of businesses (53%) have expressed that the main cause contributing to hiring difficulties in jobseekers is lack of relevant work experience; or lack of technical or occupational skills (49%). Forty percent (40%) have cited that there are not enough qualified applicants to choose from.

In summary, employers in the Territory have identified skill gaps in the workforce in three specific categories:

- **Soft Skills** – to include customer service, punctuality and time management
- **Basic Academic Foundational Skills** – specifically math, writing and verbal language efficiency
- **Low Technological Skills** – limited basic fluidity, limited knowledge of applications and web based navigation

**Workforce Skills Assessment**

As stated earlier and based on the shift in the economy, the Virgin Islands is at a cross road with a misaligned workforce population. This asymmetry is not entirely based on educational deficiency, but partially endemic to island economy, and many years of declining output capacity (*depletion of the goods producing sector, and moving toward a single source sector economy (tourism)*), which when present spurs entry level employment and results in an areas’ labor force gaining work experience and building upon skill sets necessary to meet employers job demand.

An independent survey conducted by the Virgin Islands Bureau of Economic Research, on employment skills gap, in 2015 supports the analysis of the skewed infrastructure. Of the establishments that were respondents in the survey, 38% indicated having difficulties filling positions. Sectors that experienced difficulty were retail, scientific, professional, and accommodation services. Some of the difficulty is attributable to the seasonality component prevalent in the aforementioned areas, wherein the business cycles window of ramping up personnel for quarterly employment, or short term projects at times places pressure on the labor
supply pool for a given period. However, although the churn factor within a twelve month cycle is persistent, the required occupational and requisite skill sets deviation is negligible.

The survey revealed technical management, sales, administrative, and skilled trades are most difficult to fill. Short falls in the number of candidates with relevant work experience was a primary reason reported by 53% of the respondents. Forty-nine percent (49%) stated candidates lacked technical or occupational skills. Sixteen percent (16%) cited candidate’s unwillingness to accept offered wages. Other minute reasons were lack of soft skills, behavioral, and work ethics.

There is unanimous consensus on the impact of the workforce’s skills gap on the surveyed establishments. Overall it touches each entities bottom line, workload, and competiveness abroad and in the local market. Some of the factors which are ranked in the chart by responses are delay in product development, loss of revenue, market share and/or niche, operating cost and loss of customers.

<table>
<thead>
<tr>
<th>Area</th>
<th>Rank</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increased workload on other staff</td>
<td>64%</td>
</tr>
<tr>
<td>Increased operating cost</td>
<td>26%</td>
</tr>
<tr>
<td>Revenue Loss</td>
<td>26%</td>
</tr>
<tr>
<td>Eroded Customer Satisfaction</td>
<td>19%</td>
</tr>
<tr>
<td>Loss of Market Share</td>
<td>19%</td>
</tr>
<tr>
<td>Set back in product development</td>
<td>14%</td>
</tr>
<tr>
<td>Hindrance in meeting quality objectives</td>
<td>34%</td>
</tr>
</tbody>
</table>

Based on the information collected and looking at other external data from education test scores and candidate’s resumes, the Virgin Islands Workforce System has to focus its talent development in the short term around workforce preparedness and work-based training activities, on the job training and apprenticeship opportunities to meet the work experience deficit and be able to source the labor market with dynamic candidates.

Workforce Development, Education and Training Activities Analysis

(A) The State’s Workforce Development Activities

The Virgin Islands Workforce System is comprised of workforce and related programs from both WIOA core program partners and required one-stop delivery system partners. The agencies that make up the core program partners include: the VI Department of Labor, which administers the Youth, Adult, Dislocated Worker and Wagner-Peyser programs; the VI Department of Education, which administers Adult Education and Family Literacy programs and the VI Department of Human Services which administers the Vocational Rehabilitation program.
The Virgin Islands Workforce Board serves as the link between all interagency and partner organizations as well as employer-generated activities and programs. The Board is charged with system coordination, integrity and compliance, and continuous improvement. Each of the four core agencies is represented on and is a voting member of the Virgin Islands Workforce Board.

**One-Stop Job Centers**

The Virgin Islands One-Stop Job Centers, housed in each island district at the VI Department of Labor’s offices serves as the hub of all employment and training activity. It is a job-driven system designed to simplify access to education, training and support services needed to attain employment. It is specifically designed to assist those with multiple barriers to attaining and maintaining employment by streamlining administrative functions and focusing on individual goal attainment. An expansive offering of career readiness and training services are available and may be accessed either virtually through the Virgin Islands Electronic Workforce System (VIEWS) at [www.vidolviews.org](http://www.vidolviews.org) or in person at one of the two Job Center branches. Services are available to both job seeker customers and employer customers.

The Virgin Islands Workforce System operates on the premise that everyone who accesses the system is seeking employment – either a first time job or an advanced work opportunity. To achieve these goals individuals must be equipped with knowledge of their career interest area, the skill levels to perform at their desired point of entry, an understanding of the local work environment and the discipline to be effective and productive on the job. The Workforce Innovation and Opportunity Act (WIOA) provide the framework through which these services are delivered. Job seekers have access to career services (that prepares them for the workforce); training services (that helps them attain the credentials in varying skill areas) and follow up services (to ensure that career goals are met).

The Virgin Islands Job Centers also serve as a portal to the business community. The Employer Engagement Team assists business, small to large with solutions to their workforce needs. Employers can schedule access to the Job Centers facilities for screening, interviewing or providing workshops for their current or potential employees; they may request assistance with the administration of testing or career assessments; work with business service representatives to develop job fairs or information dissemination; post their job vacancies; or schedule hiring events. Employers can also take advantage of a range of business training solutions that help their employees ascend the career ladder within their organization. Those solutions include incumbent worker training that allow current employees to upgrade their skills or customized training for new and current employees who need to master a specific skill set.

The Virgin Islands Workforce System is made up of multiple programs offered by WIOA core and non-core partners who coordinate services to reduce duplication and ensure that all potential
barriers are addressed. The core partners include Title I (Adult, Dislocated Worker, Youth programs); Title II (Adult Education programs); Title III (Wagner-Peyser programs) and Title IV (Vocational Rehabilitation programs).

**Title I**
Job seeker customers have access to services to include job readiness workshops and seminars, individualized career counseling, and job search, matching and referrals. Those customers requiring additional assistance in securing employment work with case managers to develop an individual service strategy (ISS) which identifies their employment goals and sets a path through educational services, work experiences, occupational skills training and support services to help each individual achieve that goal. Job seekers who are new to the world of work can test their newly developed skill through short term work experience or on-the-job training. Current labor market information can be accessed through the virtual system www.vidolviews.org and is used to ensure that training is aligned with locally in demand occupations.

Additionally, job seekers who have been or are about to be laid off from their current employment have access to all workforce preparedness and training services. Through the reemployment program they can rework their resume, hone their interviewing techniques and job search skills. If retraining is necessary they are referred for occupational skills training in local demand occupation areas.

Youth customers have access to fourteen (14) program elements designed to develop the whole person with wrap around services that are connected to career development goals.

**Title II**
Customers who seek to obtain their high school diploma or equivalent are referred to Adult Education services offered by the VI Department of Education. Students can achieve their secondary level credentials through the traditional route – attending subject specific classes to earn credits (20 required); or by taking preparatory courses for the General Educational Development (GED) diploma which consists of a set of five tests: Math, Reading, Writing, Social Studies and Science.

All Adult Education students are assessed with the Test of Adult Basic Education (TABE). Students who score 6.9 or below on the TABE are enrolled in skills classes. Basic Skills Enhancement courses are available for students who need goal-specific elementary or secondary level basic skills such as work related math, functional literacy and reading or writing assistance. For English language learners, English as a Second Language (ESL) classes from the pre-literacy to the advanced level are available to help the adult learner develop speaking, listening, reading writing and grammar skills to communicate effectively and function successfully with their workplaces and community.
**Title III**
Wagner-Peyser programs are also administered by the VI Department of Labor. The primary customers are job seekers who are skilled and ready for work or who have been in the workforce and are seeking employment change or advancement. These customers can either virtually or in person use the resources of the Job Centers to prepare/update their resumes; attend virtual or in-house workshops and seminars designed to enhance workplace etiquette; attend short-term pre-vocational activities to enhance specific skill sets such as computer literacy, communication skills and interviewing techniques. Job search activities generated through live labor market data and demand sector information.

Labor market information to include an analysis of workforce trends, economic indicators, labor market supply, income and wage data and occupation and industry profiles are a few of services available to employers using the Workforce System. Information is available either virtually through the Virgin Islands Electronic Workforce System [www.vidolviews.org](http://www.vidolviews.org) or through the Job Center.

**Title IV**
Job seeker customers who because of a disability may need additional assistance attaining employment may be referred to Vocational Rehabilitation services administered by the VI Department of Human Services. Once eligibility is determined through a comprehensive assessment, customers work with a VR counselor to develop an Individualized Plan for Employment (IEP). The services available include: vocational counseling, guidance and referral; vocational training; transition services from school to work; rehabilitation technology services; supported employment; and job search and placement.

The Vocational Rehabilitation Program serves persons with various types of disabilities. Financial eligibility may be required to receive some purchased services.

**Required Partners**
Programs offered by the required partners of the One-Stop delivery system include: the VI Department of Labor – Unemployment Insurance program; the VI Department of Education – Career and Technical Education programs; the VI Department of Human Services – Temporary Assistance for Needy Families program, Supplemental Nutrition Assistance Program and the Senior Community Service Employment program; and the VI Housing Authority – Youthbuild, Resident Opportunity Self Sufficiency (ROSS) and Family Self Sufficiency (FSS) programs.
(B) The Strengths and Weaknesses of Workforce Development Activities

Strengths

Single point of Operations – The base of operations for the Virgin Islands Workforce System has always been managed by a single entity – The Virgin Islands Department of Labor. It houses the Adult, Dislocated Worker, Youth, Wagner-Peyser and Unemployment Insurance programs. Program and fiscal staff interact consistently to align activities and services for both job seeker and employer customers. The LMI unit is also in-house which facilitates the access to real time data and analyses that drives decision making by the Board as well as Workforce Staff. The Department of Labor serves as the clearinghouse for all employment activities. By VI law (Act 5174) all employers must register their job vacancies with the Virgin Islands Department of Labor.

Small Community – The Virgin Islands is a small community therefore workforce agencies and programs share the same customer base thus providing additional opportunities for alignment of activities and services. Partnerships and interagency activities are more fluid and translated through living Memoranda of Understanding – ensuring that the customer receives holistic support services while they progress along their chosen career paths.

Weaknesses

Island economy – The Virgin Islands is a single local delivery area; however, there are two districts in the Virgin Islands which are separated by forty miles of ocean. All services must be made available in each district in order for customers to have access to the full range of workforce services. This is true for the partner agencies and community organizations as well. This separation creates an inherent duplication in all services and activities proffered.

Employment base is limited – While job seeker customers may have career goals that are in keeping with the fast moving global economy, those occupations are not often present or practical within an island economy where demand occupations are relatively static.

Inconsistency of service delivery between island districts – The flow of services and products offered between island districts, although expected to have some unique distinctions, are not consistent enough to create the image of a unified system. Customers are challenged to see the Workforce System as a single unit of operation.

Limited data sharing – The partnerships formed with both internal and external partners of the Workforce System have not yet reached the point where technology bridges the gap.

Program Silos – The Workforce System has made great strides in collaborating with programs and partners to streamline access to services; however, many programs still operate in a vacuum once the common intake process is completed.

Undue demand on Employers – The employer base in the Territory is comprised largely of small to medium sized business. Businesses in the VI have traditionally been good corporate partners; however, with multiple demands by multiple agencies and organizations on the same entities the element of fatigue takes its toll on even the most willing employer.
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(C) State Workforce Development Capacity
The Workforce Innovation and Opportunity Act present a new vantage point for serving all customers of the workforce system. Previously focused on talent development, the new system is job driven and focuses on developing talent with specific employment outcomes in local demand sectors as the goal.

Currently, the US Virgin Islands has two main One-Stop or American Job Centers – located in each of the island districts. The AJC’s are housed within the Virgin Islands Department of Labor offices with the core partner Vocational Rehabilitation and non-core partners SNAP and TANF maintaining a physical presence on a scheduled basis each week. Adult Education does not have a presence in the Job Center; coordinated referrals are done for literacy and GED training and testing. There are two Access Points, one in each island district, housed by the University of the Virgin Islands Community Engagement and Lifelong Services (UVI-CELL) which are located in close proximity to public housing communities. The Access Points serve as a point of registration into the Workforce System, point of access to information on career readiness, job opportunities and available training and a learning site for selected training.

By forging stronger partnerships with both core and non-core partners, the Workforce System has increased its capacity to reach more customers and provide them access to universal career readiness services at any location they first enter. System partners have created an orientation presentation that provides information on workforce preparedness in general and further broken down into each partner’s role in the process. An accompanying handout with location and contact information for specific services will be available.

The Virgin Islands Electronic Workforce System (VIEWS) also helps to increase the reach to customers who prefer a self directed style of navigating the system. In addition to job search, customers can also post their resume, take advantage of numerous work preparedness online courses and research the local area trends with real time labor market information.

As with the job-seeking workforce, the current agency workforce staff in each of the core as well as the non-core partner programs has seen the aging and ongoing departure of its experienced staff. While new staff is being recruited, the capacity to address the needs of both job seeker and employer customer remains challenging. The Workforce System seeks to address this by utilizing joint agency teams for customer service and employer engagement. In order to attend to the training needs of the customers, local service providers who are fewer than in previous years are adjusting their training methods to include technology, distance learning options and partnerships with employers to target specific occupational skill needs. The Virgin Islands Workforce System also looks to qualified off-island providers to offer training services in local demand areas where credentialed training opportunities in the Territory are scarce.
(b) **STATE STRATEGIC VISION AND GOALS**

The Virgin Islands strives to create a workforce system that provides access to multi-layered work readiness services and occupational skills training which results in meaningful employment for all individuals who seek to attain, maintain or advance in employment.

**Vision**

The vision seeks to create a Workforce Delivery System that promotes a dynamic collaborative between workforce agencies and business that is responsive to the growth and stability of the local economy. The System will connect to businesses by providing a full range of career development services that begins with building foundational and personal development goals, enhancing basic academic skills, and occupational skill proficiency that leads to the attainment of a post-secondary certificate or degree in order to find meaningful and progressive employment.

**Goals**

To achieve this vision, the Virgin Islands Workforce Board has developed the following goals:

<table>
<thead>
<tr>
<th>Goal</th>
<th>Description</th>
<th>Objectives</th>
</tr>
</thead>
</table>
| **Goal 1** – Enhance Business Engagement through a Sector-based approach to Workforce Training | • Develop program design in conjunction with the business sector needs  
• Establish on-going work based learning opportunities based on real time skills gaps expressed by employers | |
| **Goal 2** – Align Work-Readiness and Workforce Training Programs with Economic Development Strategies | • Proactively prepare for new employers and emerging occupational opportunities  
• Develop a signature work readiness product that stamps customer as “ready to work” through the workforce system | |
| **Goal 3** – Promote Diversification of Post-Secondary Education and Training Opportunities | • Explore alternative and innovative methods of attaining credentials  
• Foster new opportunities for online and blended learning options | |
| **Goal 4** – Develop Innovative Workforce Solutions that respond to the Employment Skills Gap | • Develop career exploration activities in local demand occupation areas | |
| **Goal 5** – Develop a recognizable “Workforce” brand | • Develop a uniquely “Virgin Islands” Workforce Center brand  
• Promote an Interactive Workforce Center to set System’s talent development capability apart from other initiatives | |
| **Goal 6** - Develop an Integrated Data System | • Integrate agency operations through technology  
• Design electronic common intake tools  
• Manage customers through shared profiles | |
(3) Performance Goals

Preliminary goals were determined for Title I the Adult, Dislocated Worker, Youth and Title III Wagner-Peyser measures. Goals were set using data from the workforce and economic analysis previously described in this document as well as past performance for the previous two program years. Performance goals were subsequently negotiated with the US Department of Labor and are reflected in Appendix I.

Goals for Title II – Adult Education and Literacy - According to the Adult Education National Reporting System (NRS), the current baseline level for the VI Measureable Skill Gains of Title II AEFLA programs are 7% and 11% respectively.

The negotiated adjusted levels for the following categories:

<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>ABE Beginning Literacy 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ABE Beginning Basic Education 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ABE Intermediate Low 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ABE Intermediate High 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ASE Low 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ESL Beginning Literacy 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ESL Beginning Low 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ESL Beginning High 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ESL Intermediate Low 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ESL Intermediate High 37%</td>
<td>38%</td>
</tr>
<tr>
<td>ESL Advanced 37%</td>
<td>38%</td>
</tr>
</tbody>
</table>

Adult Education Family Literacy Act funded programs and participant activities will be recorded using a WIOA approved MIS System to capture Territorial Adult Education data.

According the VI State Assessment Policy for Measuring Educational Gains, evaluations will be based on level completions on standardized pre and post test results with evidence of literacy gains resulting from hours of instruction. Educational Functioning levels have been adopted from the NRS and outcome measurements have identified and defined in the State Assessment Policy for each level. [Measuring Educational Gains in the National Reporting System for Adult Education (34 CFR Part 462).

Goals for Vocational Rehabilitation are pending further guidance from US Department of Education.
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(4) Assessment
During Year One of implementation of this State Plan, the Virgin Islands Workforce Board will develop a comprehensive tool to evaluate all components of the new workforce system, inclusive of all the core programs. This tool will be a formative evaluation tool that tracks activity throughout the program year and reports at quarterly intervals. The tool will be used to gauge:

- Overall functionality of the System
- Integration between core programs
- Interaction with non-core programs
- Use of Technology
- Customer satisfaction with workforce services
- Employer satisfaction with workforce services

The overall assessment will be based on the attainment of overarching goals set for the system.

(c) STATE STRATEGY
The analysis of the components of the Virgin Islands Workforce System, to include the Economi and Workforce Analysis; and the Territory’s Strategic Vision and Goals led to the development of the following strategies.

(1) 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)

Workforce development activities revolve around the build out of Industry sectors. The Territory’s current demand sectors based on current hiring trends are:

<table>
<thead>
<tr>
<th>Industry</th>
<th>Occupation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative and Support Services</td>
<td>• Administrative Staff</td>
</tr>
<tr>
<td></td>
<td>• Program Managers/Administrators</td>
</tr>
<tr>
<td></td>
<td>• Security Guards</td>
</tr>
<tr>
<td>Allied Health</td>
<td>• Nursing</td>
</tr>
<tr>
<td></td>
<td>• Home Health Care Attendants</td>
</tr>
<tr>
<td></td>
<td>• Healthcare Technicians</td>
</tr>
<tr>
<td></td>
<td>• Child Day Care Attendants</td>
</tr>
<tr>
<td>Construction Trades</td>
<td>• Electricians</td>
</tr>
<tr>
<td></td>
<td>• Carpenters</td>
</tr>
<tr>
<td></td>
<td>• Masons</td>
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<td></td>
<td>• Welders</td>
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<tr>
<td></td>
<td>• Plumbers</td>
</tr>
<tr>
<td>Information Technology</td>
<td>• Program Analysts</td>
</tr>
<tr>
<td></td>
<td>• Information Systems Operators</td>
</tr>
<tr>
<td></td>
<td>• Fiber Optic Installers/Technicians</td>
</tr>
<tr>
<td></td>
<td>• Network/Computer System Administrators</td>
</tr>
</tbody>
</table>
STATE UNIFIED PLAN – US Virgin Islands

| Leisure and Hospitality | • Office Managers  
|                        | • Front Desk Clerks  
|                        | • Food & Beverage Service  
|                        | • Marine Service Workers  
| Retail                | • Retail Clerks & Managers  
| Transportation and Logistics | • Heavy Equipment Operators  
|                        | • Warehouse Clerks & Logisticians  

In order to accommodate openings in these areas, both short and long term preparedness strategies are required. The hospitality and retail sectors are the most fluid and require a quick turnaround period. A short term career pathway plan that spans 4-6 months enable customers seeking employment in these sectors to engage in workforce activities that develop basic foundational competencies – personal, academic and workplace – while simultaneously receiving occupational skills training to acquire industry-recognized credentials in their desired field. A short term work experience becomes an intrinsic part of the strategy to ensure that the customer has the competitive edge needed to attaining employment.

The career pathways to attaining industry recognized credentials in the administrative and support services, construction trades, and transportation sectors require a 6-12 month training period that allows for more intensive training coupled with on-the-job learning. Allied health and information technology sectors will see a training path that spans 9-18 months. All training offered start with the basic foundational competencies to ensure a job seeker is equipped with life skills needed to perform on any worksite. On-the-job training, pre-apprenticeships and Registered Apprenticeship options factor into the training offerings. Customers who embark on long-term strategies will have several off-ramps to seek full time employment at varying levels of competency – specifically, entry-level, intermediate or advanced.

The training strategies for each career path will be developed jointly by workforce professionals, educator/trainers and industry-specific experts to ensure that the training is timely, relevant and leads to portable industry recognized credentials.

(2) Strategies the State will use to align the core programs, 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.

The Workforce Innovation and Opportunity Act focuses on providing opportunities for those individuals with multiple challenges that prevent them from entering the workforce. This includes out-of-school youth, dropouts, individuals with basic skill deficiencies and individuals with disabilities, English language learners and the long-term unemployed.
The service strategies are broken into three tracks of development: Ready for Work; Job Assist; and Intensive Career Preparation.

*Ready for Work* – This group of individuals are ready for work. They may have already chosen their career path and are equipped with skills, credentials and some work experience, but are still having challenges connecting or reconnecting to employment. Through the Job Center customers have access to a variety of workshops that include, resume preparation, interviewing techniques and workplace etiquette. Self directed programs that boost confidence and helps an individual learn to “sell their skills” are also available. Current job listings are always available which facilitates the search process. Customers can participate in these activities either on their own or with the assistance of a career counselor. If support services are needed both workforce and partner agency representatives are available to provide assistance. These customers are ready for work and with a little guidance can land their dream job.

*Job Assist* – These customers may have work experience but no specific job interest or skill level. Career counselors begin by developing an individual career plan that includes career assessments, academic competency level testing and career exploration and matching. Referrals to core and non-core partner programs are made and noted on the career plan to coordinate activity intervals. Some customers on this track may be seeking retraining to advance their skills and/or credential level. Local LMI information is provided so that customers can make informed decisions about their career areas of interest and determine the time and effort needed to achieve their goal. Education and training opportunities are made available and customers choose the intensity of their path. Customers requiring this level of assistance may take 6-12 months to complete the foundational competencies and academic/training required to accomplish their goals. They will have access to job shadowing, on-the-job training, paid or unpaid work experience and transitional employment before they complete their regimen. Career counselors are available throughout their journey to assist and encourage. Once career credentials are earned, customers are assisted with finding unsubsidized employment.

*Intensive Career Preparation* – This track is taken by individuals who face significant or multiple barriers to employment. They may need preparation for a high school diploma or GED. Some may be English language learners who have a skill but have challenges functioning in a new environment. Others may have visible or hidden disabilities that can be successfully managed with a longer development plan. Still other customers may experience difficulty maintaining employment due to poor social skills or work habits. Customers who are served in this track will work with career counselors to map out and follow the same foundational to training path as other customers and have access to the same tools and activities; however, in addition to that they will have mentors that work with them throughout their time in the workforce system to give them the added encouragement they need to complete their goals.
Integration with Partner Programs – All tracks are available to core and non-core partner participants either through referral to the Job Center for services or through development of shared Individual Employment Plans.

Partners share in the provision of workshops in the Ready for Work track. Subject matter experts from both core and non-core partners to include TANF and SNAP offer workshops at the Job Centers that are available to all customers and may be scheduled through their IEP. Further, several workshops are developed with the “hardest to serve” customer in mind. TANF, SNAP, Vocational Rehabilitation and Reemployment customers are all required to participate in a “Getting Ready for Work” workshop series. Local Certificates of Completion are given to those who complete the series. The Business Services Unit which includes representatives from all program agencies advise employers to be on the lookout for these certificates to show which potential employees have benefitted from these workshops.

By offering a general orientation at which all partners provide information about the services available at both the Job Centers and at various entry points customers are able to work with their case managers to develop a schedule that fits their individual needs. A common intake form that is shared among referred partners documents Basic Career Services to include eligibility determination, registration and initial assessments. This may be done by any partner program where contact is first made. Individual Career Services and Training services currently includes referral between partner programs; however, the System is working towards having all training opportunities listed in one service menu and available to all customers eligible to access training.

While some services are program specific such as GED testing which may only be provided by Adult Education staff, GED preparation programs are available at the Job Centers and through other eligible providers. Successful completers of the preparation programs may now sign up for testing through the Job Centers.

Addressing Weaknesses – Workforce partnerships among core and non-core partners have been formed during the planning phase of this document. Many of the discussions have focused on the challenges found and the solutions possible in building a unified system that is readily identifiable in each district because the services, activities and outcomes are similar. Partners will continue to meet periodically to review services and activities offered in the Job Center to ensure consistency of services. Core partners will have access to VIEWS to facilitate case management of joint customers. Through an improved referral process pertinent data will be shared between partners to reduce duplication of intake information. The employer engagement team now consists of representatives from all core partners in order to create a coordinated approach to working with business on projects and activities.
III. OPERATIONAL PLANNING ELEMENTS

(a) STATE STRATEGY IMPLEMENTATION

(1) State Board Functions
The U.S. Virgin Islands is a single State local area and has one Workforce Board who performs the duties of the State and Local boards. The Virgin Islands Workforce Board is comprised of twenty-three members to include the Commissioners of the three workforce agencies – Labor, Education and Human Services, the State Administrator for Adult Education and Family Literacy, the Administrator of the Vocational Rehabilitation program, representatives from the University of the Virgin Islands, Economic Development Authority and Workforce Development; representatives of local labor unions and majority representation from local businesses. A complete roster of VIWIB members can be found at the Workforce Board’s website - www.viwib.org/board/members.htm.

The Board has three standing committees – Executive, Strategic Planning and Operations. There is a Youth committee that operates as a sub-group of the Operations committee. During the planning stages of this document an ad-hoc working group was formed to gather more intelligence on the economic and workforce outlook for the Territory. This information formed the basis of the State Planning section. In addition to WIB Strategic Planning members the committee also included representatives from the Office of the Governor, Bureau of Economic Research and the University of the Virgin Islands.

Private sector board members were selected based on their affiliation with local in-demand occupations. As sector strategies are built out, these board members will take the lead to ensure the accuracy and integrity of workforce product delivered. Career pathways will be developed in a similar manner. The State Administrator of Adult Education and Literacy also oversees the State Career and Technical Education programs in the Territory and in conjunction with the Career and Technical Education Board and local businesses has begun to align career pathway development with the local demand occupations to ensure a smooth transition from secondary school to post secondary education or training.

The Virgin Islands Workforce Area consists of one region. Programs and activities developed for the delivery area are the same as that of the region. Tourism and hospitality is the overarching resource of the area and many businesses support it or feed into it thus creating one solid product. Through academic advancement, occupational skills training and workforce preparedness efforts, the Board seeks to align the Territory’s workforce system with multifaceted requirements of meeting the regions workforce demand.
The members of the business or employer community are also customers of the Workforce System. Board members provide first hand advice on the types of products, activities and offerings that might benefit a business. Resources are made available through the One-Stop delivery system to help them develop their talent pool and expand their workforce. The business engagement unit within the Job Centers conducts outreach to businesses to advise them of various workforce strategies that might be beneficial to them. Real time labor market information is also available to businesses to help their decision making processes when considering expanding or withdrawing from the local labor market.

The major workforce agencies are represented on the Workforce Board and strategies to assist those individuals with barriers including those with disabilities are brought to the forefront and included in any plan proffered to increase access to the workforce.

(2) Implementation of State Strategy
In order to realize the Territory’s vision and goals the partners of the Workforce System have formed a “partner’s workgroup” led by the SWDB director and made up of core agency program directors, non-core program directors, administrators and front line managers. During the planning phase, the group met weekly to discuss areas of possible collaboration and streamlining of services. A splinter group comprised of program directors and front line managers also met once a week to discuss each programs current operations and features of their individual system in order for each group to gain a better understanding of what each agency duties entailed.

(A) Core Program Activities to Implement the State’s Strategy
The partner’s workgroup will continue to meet on a semi-monthly basis to ensure the implementation of WIOA progresses smoothly. Representatives from each of the core partners – Adult, Dislocated Workers, Youth, Adult Education and Family Literacy, Wagner-Peyser and Vocational Rehabilitation have agreed on a universal intake strategy. A common intake form and process is being designed to simplify the customer’s initial entry into the workforce system and promote the “one system” message across agencies. Customers will be made welcome “at any door” and will have access to basic information on obtaining services from each of the core partners.

The Job Center will operate as the hub of workforce services and in addition to providing information, all core partners will be able to deliver at least their initial assessment services at these centers. An inter-agency video is also being created to provide a system-wide orientation to the activities of the workforce system promoting “employment” as the joint goal. The orientation is the key to tying the agencies message together. The videos will run on a loop at each Job Center site as well as in the lobbies of each core and some One-Stop partner agency locations.
(B) Alignment with Activities outside the Plan
The required One-Stop partners who are not core partners include the Temporary Assistance for Needy Families (TANF) program; Supplemental Nutrition Assistance Program (SNAP); Unemployment Insurance (UI); Career and Technical Education programs (CTE); Senior Community Service Employment program (SCSEP) and Housing and Urban Development (HUD) programs. These programs have also participated in the planning process for WIOA and some maintain a presence in the Job Centers. They will also be included in the orientation video to ensure the consistency of the service flow. The VI Workforce System has upgraded its referral process so that all agencies are represented in its service delivery plan and customers with barriers – limited access to housing, food and support services – are provided with options for addressing their most basic needs as well as supplementing the needs that enable them to prepare for attaining unsubsidized employment. A universal referral form with links to all core and One-Stop partner programs has been developed to facilitate the referral process as well as to reduce the duplication of services.

(C) Coordination, Alignment and Provision of Services to Individuals
An individual service strategy will be developed for all customers seeking more than basic career services that include referrals to core and one-stop partners for additional services. The referral connections are currently documented in the service strategy and followed up via points of contact in each agency and through email and telephone contact. In addition to the core partners, One-Stop partners TANF and SNAP also maintain a presence at the Job Centers facilitating the referral process to occur in real time. Appointments can be set up on the spot and customers benefit from making all their connections at one location. For those customers accessing the System from a non Job Center location, the universal referral form is used to ensure consistency and reduce duplication. Each core and partner program retains the integrity of their program requirements by having their staff perform the more involved services of their respective programs. Coordinated activity occurs at the onset and in the referral process. The Virgin Islands is working on an electronic solution to this connectivity to ensure a faster more accurate response to customer needs. This solution is slated to be rolled out during the first program year of Plan implementation.

(D) Coordination, Alignment and Provision of Services to Employers
The Business Engagement team now consists of representatives from the core programs and some of the One-Stop partner programs. The joint agency team will conduct outreach to employers to provide information on the services and programs available to them through the Workforce System. This information will be disseminated through quarterly Employer Educational Forums/Seminars; Workforce newsletters and on-site visits that will occur on a rotating basis to ensure coverage to all employers during a set timeframe. The Employer Newsletter will cover topics such as: Developing Sector Strategies; Acquiring a Skilled Workforce; Hiring Workers with Disabilities; Recruiting through Job Fairs and Workforce
Expansion Strategies to name a few. A calendar of Employer Workforce events will be developed and posted at the Virgin Islands Department of Labor website www.vidol.gov with a link established at each core and partner agencies websites for easy access. Additionally, an interactive feature will be added to the website so that employers can voice their suggestions and concerns.

(E) Partner Engagement with Educational Institutions
The U.S. Virgin Islands does not have a community college; however, the University of the Virgin Islands with campuses in both island districts has been and continues to be an integral partner to workforce development; both through its assistance with program and curricula development and through the University’s Community Engagement and Lifelong Learning or (UVI-CELL), its community college unit that offers online and face to face courses developed specifically to fill the Territory’s post-secondary skill gaps.

UVI-CELL also maintains a physical location in each island district that border public housing communities; this has enabled them to act as access points for workforce delivery services outside of the Job Centers. Information dissemination and skill training occur at these sites when necessary to facilitate attendance by those for whom access to transportation is a hardship. Several career pathways to include the construction trades, business administration and nursing begin with career exposure and coursework in secondary school that contain foundational and early occupational skills training and ultimately result in entry-level certification at high school graduation. The training continues on through post-secondary at UVI-CELL with higher level industry-recognized certifications and at the University of the Virgin Islands with associate and bachelor degrees.

(F) Partner Engagement with Other Education and Training Providers
The Workforce Board has also partnered with numerous training providers who have expertise in training and development activities in demand sectors. These providers work primarily with the adult learner, including those with barriers to employment. All training providers are required to make available reasonable accommodations for individuals with disabilities. Career and Technical Education programs of study to include allied health, the construction trades, information technology and administrative and support services highlight the local offerings and work in concert with the business community to ensure the integrity of the programs. The providers are an important part of the career pathway for local demand occupations; specifically for the adult learner who is attempting to advance their education and skill levels while holding down a job. The providers offer flexible schedules and relevant training developed in concert with employer partners to ensure training is up-to-date and can result in industry-recognized credentials.
All providers listed on the Territory’s Eligible Training Provider List are available to customers from all partner eligible funding streams. The University of the Virgin Islands community arm UVI-CELL offers program certificate courses and related program certification for many of the demand occupations listed. Participants from all partner agencies take advantage of these opportunities as they are available Territory-wide. The services from private or community based providers are available to partner agencies district wide since many providers offer programming specific to the island where they are located.

**(G)Leveraging Resources to Increase Educational Access**

The Workforce Innovation and Opportunity Act calls for increased access to educational and training services. The Workforce Board as well as the interagency partners’ workgroup is discussing reasonable options for leveraging existing resources. In the Territory, workforce development activity across the agencies is funded primarily through federal sources. The replication of services to accommodate separate island districts presents a challenge to leveraging limited resources while still maintaining the integrity of each individual program. This is an issue that will continue to be addressed at the Board and agency levels.

Currently, all core partners utilize the services of the University of the Virgin Islands and UVI-CELL by funding eligible customers in programs of study (either degree or certificate) that meet their Individual Employment Plan. In order to maximize the number of customers that may benefit from this resource the agency partners’ workgroup continue to work on developing joint service strategy form that includes shared costs for funding customer services, at both local and off island training institutions. See Action Plan for timeline on completing this item.

**(H)Improving Access to Postsecondary Credentials**

The newly re-energized partnerships formed by the WIOA core and One-Stop partner programs have committed to “employment as the outcome” as the basis for all education and training programs offered and delivered. In order to deliver well educated and highly skilled workers it is imperative that all training offerings result in post-secondary credentials that are industry recognized. The Workforce Board, charged with reviewing and approving training providers and their course offerings, requires that all training has an approved industry curriculum and delivers content sufficient for a student to take and pass a national credentialing exam.

The Department of Education through their Adult based Career and Technical Education program offers a wide variety of post-secondary occupational skills training programs – many of which are on the Demand Occupation List and are available in both island districts to the general public. The Department of Education is an Eligible Training Provider in the Territory.

Some employers offer training in-house *(incumbent and customized)* to prospective as well as current employees thus expanding customer access to those already in the workforce. Although
not required to be on the Eligible Provider List these employers often collaborate with the workforce system to expand their customer pool and gain access to federal funds. The review and approval of their training offerings are subject to the same scrutiny by the Workforce Board as any other provider. At the completion of any occupational skills training provided by an employer and funded through the federal workforce system customers must be ready to take national credentialing exams.

Customers whose first point of entry to the Workforce System is through TANF, SNAP, VR, SCSEP or HUD are all provided information on training services at the orientation given at any door. Case managers or career counselors advise them on the steps needed through development of their service strategies and referrals are made accordingly ensuring that all barriers are addressed before embarking on a training regimen. Having access to different avenues of training increases the opportunities for more customers to find training in their area of interest at different locations throughout the Islands.

(I) Coordinating with Economic Development Strategies
The Workforce Board has engaged with Economic Development representatives throughout the Territory’s planning stages to align the workforce vision with the economic goals. The Chief Executive Officer of the Economic Development Authority who is also a member of the Virgin Islands Workforce Board and the Chief Economic Policy Advisor out of the Office of the Governor, have both been strong participants in the development of the State’s strategy. The implementation of this strategy is in concert with the goals of both entities. These entities are constantly seeking new tools and products to help bolster the viability of existing businesses and new businesses are being recruited to the Territory that fall into the emerging occupations listing. The Board will continue to work with economic development to training strategies for their current and potential workforce.

(b) STATE OPERATING SYSTEMS AND POLICIES

(1) The State operating systems that will support the implementation of the State’s strategies
The Virgin Islands Workforce System uses the Virgin Islands Electronic Workforce System (VIEWS) as the overall tool for disseminating labor market information, driving data systems, case management for Adult, Youth, Dislocated Workers and Wagner-Peyser programs and job search and listings. The Adult Education and Family Literacy program uses Power School as their data management tool and to collect information needed for federal reporting. The Vocational Rehabilitation program is currently considering new options for information management to include having a VR portal attached to VIEWS. This transition would provide
optimum integration capabilities between Titles I, III and IV, and would facilitate better case management of customers.

All WIOA core and One-Stop required partners will have “view-only” access of common (non-confidential) data to the VIEWS operating system to align service strategies for customers. Partners will be trained to help customers with their initial registration on VIEWS from any location; and all have access to labor market information and job listings. Policies for the joint use of the operating system are being crafted.

The Virgin Islands Electronic Workforce System (VIEWS) is the tool used for data collection to produce quarterly and annual reports for Titles I and III. With the addition of Vocational Rehabilitation three of the four core programs will be able to generate joint and agency specific reports through this system.

The VI Department of Education AEFLA program purchased an MIS System that is WIOA compliant called LACES. The company, Literacy Pro, uses LACES for Agency data and the much larger Community Pro for interfacing with various departments that have existing MIS Systems. Community Pro is able to accept information from several commonly used MIS Systems and convert it to where it is compatible and WIOA compliant. Conversely, the information may interface with VI Department of Labor’s VIEWS MIS software. Additional time will be required to finalize MIS System coordination plans and efforts between Adult Education and other Partner agencies.

(2) State policies that will support the implementation of the State’s strategies

The Virgin Islands Workforce Board has developed policies that support the foundational elements of the Territory’s strategy. Policies are disseminated as Workforce System Guidance (WSG) or Workforce Program Guidance (WPG). Policies include WIOA Title I Eligibility Requirements, Delivery of Services and Activities under WIOA, WIOA Training Provider Eligibility Process, Removal from the Eligible Provider List and Grievance to name a few. The development of policies and procedures that include the joint operation of core partners is still in progress. A listing of WIOA policies can be found on the WIB website at www.viwib.org.

An additional list of joint system policies being developed may be found in the Action Plan. The format for Joint Policies to be developed is as follows:

- Interagency program directors and managers determine that a joint process needs to be in place for a given service or function;
- An interagency workgroup is formed to secure data and best practices;
- The group develops recommendations to be considered by the Board;
- The Operations committee of the SWDB meet to consider recommendations and finalize policy;
- The SWDB issues joint policy.

Since the Virgin Islands is a single state local area, the SWDB issues policy directly to the One-Stop delivery system.

The State Office Career, Technical and Adult Education will continue to collaborate with the Virgin Islands Department of Labor, The Virgin Islands Workforce Development Board and its affiliates, as well as its WIOA Partner Agencies to more clearly define the role of Adult Education as it integrates its Services to provide instruction throughout the Territory.

The State Office will continue to conduct a review of its policies in place to ensure that it is to Standard. The Adult Education programs are supported in part by the local Government of the Virgin Islands which allows the Division to conduct a number of higher level activities to help bridge the divide and allow learners within reach of their goals to achieve completion. An annual amount determined by the Legislature of the Virgin Islands is allotted to assist.

(3) State Program and State Board Overview

(A) State Agency Organization
The Governor of the U.S. Virgin Islands is the chief executive officer in the Territory. There are no local layers to the government structure such as mayors, councilmen, district representatives or the like. The Commissioners of Agencies comprise the Governor’s cabinet. The Virgin Islands is a Single Local Workforce Area and has one State Workforce Development Board that also assumes the duties of the Local Board. The Virgin Islands Department of Labor is the designated State Workforce Agency. There are two workforce centers in the Virgin Islands – one in the St. Thomas/St. John district and one in the district of St. Croix.

The agencies that comprise the public workforce investment system include the Departments of Labor, Education and Human Services. The Virgin Islands Housing Authority, the University of the Virgin Islands (UVI) and its community development arm UVI Community Engagement and Lifelong Learning (UVI-CELL) are semi-autonomous, but are integral partners of the public workforce system. The Virgin Islands Workforce Board and the Economic Development Authority comprise the advisory and policy development segment of the Workforce system. The Governor of the Virgin Islands provides the vision and the mission that the agencies and advisory boards must then translate into viable activities that become the product to which the business community and the jobseeker public avails itself.
The Workforce Development System in the US Virgin Islands comes together through the efforts of various government agencies. The VI Department of Labor administers the WIOA Adult, Dislocated Worker and Youth programs. It also houses the Wagner-Peyser, Veterans and Unemployment Insurance programs. The VI Department of Education administers the Adult Education and Literacy program as well as the Career and Technical Education program. The VI Department of Human Services administers the Vocational Rehabilitation program. It also provides non-core programs such as Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP) and the Senior Community Service Employment Program (SCSEP). Non-core programs that fall under the Workforce Development banner include Youthbuild, Resident Opportunity Self Sufficiency (ROSS) and Family Self Sufficiency (FSS) all under the VI Housing Authority.

The Virgin Islands Division of Adult Education has established an agreement with the Virgin Islands Department of Human Services to deliver instruction and services to the clients of the Department of Human Services to facilitate Adult Basic Education instruction. A portion of the funding would cover the cost of educating clients through the Adult Education /Human Services agreement.

Each of these programs is staffed by agency personnel and adheres to agency specific funding requirements, but converge at the Job Centers for joint pre-employment workshops and career development activities. Training services are offered by shared Eligible Training Providers and may be funded in whole or in part by partner agencies through a coordinated service strategy. The chart below is reflective of the VI Workforce Development System.
(B) State Board
The State Workforce Development Board (VI Workforce Board) is charged with coordination, development and maintenance of the overall integrity of the Workforce System. In this multi-faceted system, the diversity of the Board will provide continuity by aligning goals among agencies and organizations. Board members bring to the table expertise not only in their area of operation but also from their alliances with other organizations – for example, members of the State Workforce Board are active members of the Career and Technical Education Board, the Vocational Rehabilitation advisory group, Rotary organizations, Chambers of Commerce and other community-based groups.

The Commissioners of the three lead agencies with workforce programs sit on the Board. The Commissioner of Labor and the Assistant Commissioner of Employment and Training represent the Virgin Islands Department of Labor whose oversight authority extends to programs authorized under WIOA Title I including Adult, Dislocated Worker and Youth programs, and Title III the Wagner-Peyser program, and also the Unemployment Insurance and Veterans employment programs.

The Administrator of Vocational Rehabilitation represents WIOA Title IV programs under title I of the Rehabilitation Act of 1973 – Vocational Rehabilitation. The Commissioner of Human Services represents Temporary Assistant for Needy Families (TANF), employment and training programs under Supplemental Nutrition Assistance Program (SNAP), and the Senior Community Service Employment program (SCSEP) title V of the Older Americans Act of 1965.

The Commissioner of Education and the State Director of Adult Education and Career and Technical Education represent adult education and literacy activities authorized under Title II of WIOA; they also represent career and technical programs and literacy services for youth and programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 in the Territory. All entities described have and will continue to be involved in the Workforce Development System.

The VI Workforce Board in consultation with the Governor develops the State Plan. The Board is comprised of two major committees: the Strategic Planning Committee and the Operations Committee. All activities relating to the operation of the One-Stop service delivery system, information management systems, performance reporting and general oversight of the statewide employment statistics system is managed through the Operations Committee. All activities related to Youth services are also performed by the Operations committee. Strategic planning, policy development and direction, community linkages and cross program alignment are under the purview of the Strategic Planning Committee. A complete roster of VI Workforce Board members can be found at the WIB website www.viwib.org/board/members.htm.
(4) Assessment and Evaluation of Programs and One-Stop Program Partners

(A) Assessment of Core Programs
The four WIOA core programs will adhere to the Performance Measures described in Section 116(b) of WIOA for Adults, Dislocated Workers, Adult Education and Literacy, Wagner-Peyser and Vocational Rehabilitation, as applicable by program requirements. Specifically,

- The percentage of participants who are in unsubsidized employment during the second quarter after exit from program;
- The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from program;
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from program;
- The percentage of participants who obtain a recognized post-secondary credential, or a secondary school diploma or its recognized equivalent during participation in or within (1) year after exit from program;
- The percentage of program participants who during a program year are in an education or training program that leads to a recognized postsecondary credential or employment and who are receiving measurable skill gains toward such a credential or employment; and
- The indicators of effectiveness in serving employers.

Similarly, the primary indicators of performance for Youth, also in accordance with Section 116(b) of WIOA shall be adhered to. Specifically,

- The percentage of program participants who are in education or training activities or in unsubsidized employment, during the second quarter after exit from program;
- The percentage of program participants who are in education or training activities or in unsubsidized employment during the fourth quarter after exit from program;
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from program;
- The percentage of participants who obtain a recognized post-secondary credential, or a secondary school diploma or its recognized equivalent during participation in or within (1) year after exit from program;
- The percentage of program participants who during a program year are in an education or training program that leads to a recognized postsecondary credential or employment and who are receiving measurable skill gains toward such a credential or employment; and
- The indicators of effectiveness in serving employers.

The Virgin Islands is a single state local area and has no local jurisdictions. There are no additional measures that have been assigned to these programs.
(B) Assessment of One-Stop Partner Programs
The One-Stop program partners will continue to evaluate and assess their programs in keeping with their individual program and agency requirements. In the first year of WIOA implementation the partners’ workgroup will research best practices for methods of One-Stop evaluation. The assessment will be put into effect immediately upon determination of the process.

(C) Previous Assessment Results
The Virgin Islands Workforce System will have gathered sufficient data and have determined a method of evaluation for One-Stop partner performance by the time the State Plan modification in 2018. A system will be designed where all individual agency performance measures can be collected and a comparison chart of the results of two years of performance made available. The first year of implementation will be the baseline data by which all benchmarks will be made and performance measured and strategies developed to advance performance results in the upcoming program years.

(D) Evaluation
An evaluation method has not yet been decided upon. The Virgin Islands Workforce Board in conjunction with the WIOA core agencies will develop a process for evaluating the effectiveness of core programs. It will take into consideration the overall activity of the Workforce System; the integration of core agency programs, on-site One-Stop partner programs, the referral process for partner programs that are not on-site, the effectiveness of service delivery to the job seeker customer, the effectiveness of service to employers and the overall return on investment to the System.

(5) Distribution of Funds for Core Programs

(A) For Title I – Employment and Training Programs
Provide a description of the written policies that establish the State’s methods and factors used to distribute funds to local areas –

The Virgin Islands is a single state local area. There are no local areas as described in WIOA section 128 (b) or section 133 (b). Funding is not distributed beyond the State Agency – Virgin Islands Department of Labor.

(B) For Title II - Adult Education and Literacy

(i) Describe how the area will award multi-year grants or contracts on a competitive basis to eligible providers in the State

Eligible providers awarded federal funds through this application process will be required to use the funds for the establishment or operation of one or more programs in the St. Thomas/St. John district, the St. Croix district or both that provide services or instruction in one or more of the
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following categories: Adult Education and Literacy services; and English literacy programs. The Virgin Islands Department of Education reserves the right to make necessary policy changes after applications are submitted and to negotiate awards with potential recipients.

General Procedure for Funding Eligible Providers
The Virgin Islands will provide successful agencies with a 25% starting of their respective funding awards during the initial quarter of service and continue with quarterly draws in increments of 25% upon receipts of expenditures and verifications of services rendered.

Applications
The VI Department of Education will run an open and competitive grant process for funding with the adult education services. Eighty two point five percent (82.5%) of the federal allocation for grants will go to local entities providing adult education services.

Eligible Applicants
Eligible applicants for these funds include: (1) local educational agencies; (2) community based organizations of demonstrated effectiveness; (3) volunteer literacy organizations of demonstrated effectiveness; (4) institutions of higher education; (5) public or private nonprofit agencies; (6) libraries; (7) public housing authorities; (8) nonprofit institutions that are not described in any of these descriptions and have the ability to provide literacy services to adults and families; and a consortium of agencies, organizations, institutions, libraries, or authorities described in items (1) through (8). Community based organizations and nonprofit institutions include nonprofit faith based organizations. Public Notice of Availability and A Public Notice of Process will be distributed and advertised in the local media and related agencies. Eligible providers will also be verified against SAM.gov listing.

Request for Proposal Readers (Grant Reviewers)
A Public Notice to solicit the services for Grant Reviewers will be published in local media. Objective and Qualifications, Compensation, Scope of Work will be listed in advertisements.

The VI Department of Education, under the Provisions of the Adult Education Family and Literacy Act, will consider eligible providers seeking grant funding the submit an application within the guidelines set forth in the Workforce Investment and Opportunity Act.

Applicants will include a descriptive narrative of use of funds which will be consistent with Title II of AEFLA. Particular attention will be given to details of program and service alignment and how they will be achieve measureable outcomes. Successful Agency provider must agree to attain State set levels for performance of primary core indicators set by Federal and State Plans. Provider activities will be carried out through the One Stop Delivery System with recommendations from the Workforce Investment Board.
Eligible providers will be assessed on past demonstrated effectiveness to deliver services and effect significant educational student gains. Applicable local laws governing commerce, licensing of sub grantees and reporting will be in effect throughout the duration of the multiyear grant.

A request for Proposal (RFP), including an application packet, will be prepared and a public notice will be given to the general public to further assure equity among applicants and interested parties. All submitted entries post marked or submitted in person and time stamped within the appointed date, will be reviewed and sent to the Virgin Islands Workforce Board for additional review. The RFP process will be subject to the Procedures outlined for the Virgin Islands Department of Procurement as well as the Virgin Islands Department of Education.

(ii) **Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds**

All interested responsive parties will receive an application packet with instructions for preparation of the application and procedures for submittal to the designated Division of Purchases. The deadline will be advertised to all as prescribed. All grants are date stamped at the Division of Purchases and logged in by the Purchases Staff. The grants are then picked up by a VIDE designated staff member and teams or readers are assembled to read and rate the proposals based on a common evaluation tool which assigns numerical values to essential elements of the proposal. Grants reading teams are made up of representatives from the Virgin Islands Department of Education, educational consultants, and other stakeholders.

*Evaluation of Application*

Teams use an evaluation tool with specific criteria to determine whether the proposed applications will meet Virgin Islands Department of Education with specific criteria to determine whether the proposed application will meet Virgin Islands Department of Education quality program standards as well as the USDOE requirements set forth in Section 231 of Title II of the Workforce Investment Opportunities Act. All proposals must also submit a reasonable budget with at least a 10% local match. Applications will be read and rated a minimum of three times by trained grant readers. No grant will be funded unless it has met a minimum score of 70 points.

The Virgin Islands State Office for Adult Education will ensure direct and equitable access to all eligible providers by reinstituting its policy for the selection of prospective applicants as defined in WIOA guidelines. Additional guidance as outlined in (VI.b.)

All proposals must be returned to the VI State Office for Adult Education with WIB recommendations for final review and selection of providers.
The Eligible providers will be selected through a review process of the State Office for Career, Technical and Adult Education and the Virgin Islands Workforce Board. Assurances must be given by the successful applicant that receives the grant funding that they will conduct classes that provide adult education and literacy activities including programs that provide such activities concurrently. Reference [Section 463.20(b)]

Additionally, successful applicants will be apprised of the Target Performance categories and data as well as NRS Tables which outline areas of concentration.

Efforts will be made to strengthen information gathering of student goals for education and employment and Exit Data and follow up to facilitate the ultimate goal of client employment.

The same announcement, application and process will be used for all applicants for each RFP that is issued.

(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 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.

The Virgin Islands has one designated State Agency that is responsible for serving all individuals with disabilities within the state. Funds are not distributed to two different agencies. Many states across the US have separate agencies for persons who are blind and in some instances individuals who are deaf. The Virgin Islands has a “Combined” agency and serve all disability types. Vocational Rehabilitation has sufficient funds to serve all eligible individuals who apply for services at this time.

(6) Program Data

(A) Data Alignment and Integration

The VI Department of Labor administers all programs in Titles I and III as well as Unemployment Insurance and Veterans programs. The Virgin Islands Electronic Workforce System (VIEWs) manages the program and performance data for Titles I and III. Title IV – Vocational Rehabilitation is in the process of acquiring a management information system and considering the option of adding onto the VIEWs system. This integrated data system would benefit both customers and staff by streamlining redundant operations such as intake and creating more effective customer service strategies. Title II – Adult Education and Family Literacy uses the Power School system to gather data and customer information. It does not currently align with VIEWs but options to do so are being explored. Until then, Adult Education customers are generally also customers of Title I, III or IV and information will be picked up as
customers touch these other programs. Common intake and basic data collection occurs through an updated referral system. This ensures that staffs of all programs know where a customer’s journey begins, why referrals are made, how they are made and what services are expected by means of the referral. There are plans to acquire a universal tracking system through VIEWS that customers access upon entry into the Workforce Centers, which automatically documents the purpose for the particular visit, and outcomes achieved during each visit. Final outcomes can be traced back to the point of entry into the workforce system and all programs that touch an individual will receive the benefit.

VIEWS has the capacity to manage the data needed for reporting under WIOA section 116 (d) (2). The data systems integration of the four titles will maximize the accuracy of data collected and reported on for WIOA. This is a project that will be further researched during the next few months as implementation gets underway.

(B) Assessment of Participants” Post-Program Success
All participants will traverse the Workforce System by means of a wholly developed service strategy that accounts for the linkages needed from all relevant partner agencies and programs prior to successfully exiting the system. Customers who choose to continue on to advanced post-secondary education and/or enter or remain in employment will be assessed using WIOA performance measures as described in section 116. The State lead agencies have not determined a need for or set any additional indicators of performance at this time.

(C) Use of Unemployment Insurance (UI) Wage Record Data
The Virgin Islands Unemployment Insurance program is housed at the VI Department of Labor along with WIOA Titles I and III programs. This information has been historically collected quarterly and managed through the MIS unit to determine performance and conduct LMI analyses that are consistent with Federal and State law. The information is used for making assessments of current workforce for planning purposes, structuring programs and analyzing the demographics of UI claimants. It is also used to improved re-employment strategies for claimants – determining how long and/or often they receive benefits and return to seek other employment options. On the LMI side, wage record data is used in analysis of industries and sectors as they expand or contract, used for more in-depth look at occupational staffing patterns and for analysis of workforce development for economic growth and development.

AEFLA and Vocational Rehabilitation programs being new to the collection of wage record data for performance reporting are receiving technical assistance from their respective federal agencies. In the interim, accommodations have been made for both programs to submit wage record inquiries to the VI Department of Labor which houses the UI program. The VI Department of Labor will provide responses to the respective programs within a 7 day period.
(D) Privacy Safeguards
The Virgin Islands adheres to privacy issues as described in section 444 of the General Education Provisions Act. There are data sharing agreements in process between the agency partners. Internal policies are in place to safeguard the sharing of personal information among staff and customers.

(7) Priority of Service for Veterans

In accordance with the Jobs for Veterans Act of 2002, the VI Workforce System offers covered Veterans and eligible spouses ‘Priority of Service’. The designation requires that these individuals are given first consideration for program participation and they receive access to services ahead of “non-covered” persons or, if resources or space is limited.

In order to receive Veterans Priority of Service for a specific program, a Veteran or eligible spouse must meet the statutory definition of a “covered person” as well as any other statutory eligibility requirement applicable to the program. Additionally, ‘Veterans Priority of Service’ designation shall take precedence before applying WIOA Priority of Service for recipients of public assistance, other low-income individuals and those who are basic skills deficient.

Each Workforce Center or other points of entry will inform covered persons that by identifying as a Veteran or covered spouse, they are entitled to Priority of Service. Signage to this effect will also be visibly displayed at the site. System staff and affiliate program partners will also be required to enable and facilitate the identification so that ‘covered persons’ may take full advantage of the Priority of Service. Further, it is also required that staff and partners inform Veterans and eligible spouses of the full array of employment training and placement services available; and, applicable eligibility requirements for other programs and services. Informational pamphlets and other methods of promoting the Priority of Service provision will also be utilized to ensure that this mandate is executed.

DVOP Program
Veterans who meet the eligibility criteria as defined in 38U.S.C. Sub Section 4211(1) and (3) are identified and referred to Disabled Veterans Outreach Program (DVOP) Specialists for intensive services. These specialists provide case management services to veterans and eligible spouses of Veterans with ‘significant barriers to employment”. Veterans’ eligibility for these services includes:

- Veterans between the ages 18 to 24.
- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211 (1) and (3); Special disabled and disabled veterans are those:
  - Who are entitled to compensation (or who but for receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
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- Were discharged or released from active duty because of a service-connected disability;
  - Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a);
  - A recently-separated service member, as defined in 38 U.S.C. SS 4211(6), who has been unemployed for 27 weeks or more weeks in the previous 12 months;
  - An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or have been released from incarceration,
  - Lacking a high school diploma or equivalent certificate; or
  - Low-income individual (as defined by WIOA Section 3 (36)).

Eligible spouses’ eligibility includes:
- The spouse of a veteran who has a total service connected disability,
- Is Missing In Action,
- Captured in the line of duty by a hostile force,
- Is a Prisoner of War or
- Who died from a service connected disability.

In accordance with the authorization provided in the Consolidated Appropriations Act of 2014, the following populations are eligible to receive DVOP services.
- Transitioning members of the Armed Forces who have been identified as in need of intensive services;
- Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units; and
- The spouse or other family caregivers of such wounded, ill, or injured members.

Partnerships
In an effort to assist veterans to overcome their Significant Barriers to Employment, the Disabled Veterans Outreach Specialist will collaborate with Veterans Organizations and community-based organizations such as:
- The Methodist Training & Outreach Center
- Catholic Charities
- Bethlehem Shelter
- Eagle’s Nest Shelter
- My Brother’s Table Soup Kitchen
- Veterans Affairs Clinic
- Salvation Army
- Veterans Affairs Vocational Rehabilitation
- Local Office of Veterans Affairs
- Employer Support of the Guard and Reserve (ESGR)
- Virgin Island National Guard State Family Program Office
- Women/Men’s Coalition
One Stop Career Center staff and partners are aware of the policy and procedures addressing priority of service for veterans. This notification is also posted in our Center lobbies and the process is monitored by the Program Administrators through periodic on site reviews and evaluation of our quarterly ETA 9002 reports.

Under the Wagner Peyser program veterans receive preference for all new job postings received within the System and are afforded preferred access to a range of other services. Application of this designation and requirement is monitored through the ViEWS database and is evidenced by the established 72 hour “vet hold” on each job order. All staff are provided with a range of comprehensive information on the services available through the WIOA program and are prepared to disperse to the veterans they serve. Additionally, the DVOP specialists are fully integrated into the American Job Center and all staff are aware that veterans identified or self-attesting to meeting one or more of the criteria defined to signify a Significant Barrier to Employment (SBE), are eligible to receive individualized services from the DVOP. Once eligibility is established, the veteran is referred to the DVOP and this activity is also recorded in the database.

Veteran’s Referral Protocol

The Military Veterans’ Customer Flow chart provides a visual representation to JVSG and non-JVSG staff about the veterans’ referral process.

Veterans who walk-in and require staff assistance are registered and provided with an orientation on the Workforce System. The veterans are also provided with an intake form which indicates the various Significant Barriers to Employment. According to the responses on the intake form, veterans are either served by the AJC staff or referred to the Disabled Veterans Outreach Program Specialist for service. Only veterans with SBE are referred to and are served by the DVOP.

DVOP also receive referrals from other community partners who are serving veterans with SBE. Eligibility is determined through assessments.

Veterans who apply for Unemployment Insurance have to register with the Workforce System. If the veteran self-registers, he or she will be asked a series of questions through the online registration that will determine if he or she possesses a Significant Barrier to Employment (SBE). If the veteran does possess an SBE, the DVOP Specialists will receive an email alert indicating that a qualifying veteran registered on Virgin Islands Electronic Workforce System. Follow-up action will then be initiated by the DVOP.
(8) **Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities**

The Department will provide whatever reasonable assistance may be deemed necessary to assure programmatic and architectural accessibility including, but not limited to ensuring that:

- Customers and staff with disabilities will be provided access to assistance deemed necessary to accommodate their needs, including assistive technology and alternate barrier-free work locations.
- Assistance to disabled customers to include testing (if applicable) and placement support is reasonably accessible. Such services and support may include providing interpreters, readers and other accommodations deemed necessary.

(9) **Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners**

The Virgin Islands has a diverse population with a high concentration of individuals whose first language is Spanish or French Creole. The Adult Education program has program locations in both districts that address language learning. Through an agreement with Vocational Rehabilitation many of these programs are made accessible for individuals with learning and other disabilities. As core partners, these programs will be included in the menu of services when preparing individual career plans for each customer.

**IV. COORDINATION WITH STATE PLAN PROGRAMS**

The Strategic Planning Committee of the Virgin Islands Workforce Board in conjunction with representatives from the Office of the Governor held a series of planning sessions to develop the State Strategic Vision and Goals. The Virgin Islands Planning Workgroup comprised of directors and managers of the Adult, Dislocated Workers, Youth, Wagner-Peyser, Adult Education and Family Literacy, Vocational Rehabilitation, SNAP, TANF and Paternity and Child Support programs met weekly from March 2015 to present day to operationalize the vision and goals described by the State Board. The partners planned activities that led to the co-location of Vocational Rehabilitation, SNAP and Child Support programs in the One-Stop to the development of common intake processes and data integration. Programs from Titles I and III have always been co-located at the One-Stop centers. The group will continue to meet until all details on joint implementation have been resolved and then will continue to meet thereafter on a monthly basis to ensure continuous improvement.
## V. COMMON ASSURANCES

The Unified or Combined State Plan must include assurances that:

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<th>No.</th>
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<tr>
<td>1.</td>
<td>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;</td>
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<td>2.</td>
<td>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;</td>
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<td>3.</td>
<td>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;</td>
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| 4.  | (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public;  
(b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; |
<p>| 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; |
| 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); |
| 7.  | The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; |
| 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; |</p>
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<td>9.</td>
<td>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;</td>
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<td>10.</td>
<td>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);</td>
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<tr>
<td>11.</td>
<td>Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and</td>
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<tr>
<td>12.</td>
<td>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.</td>
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VI. PROGRAM SPECIFIC STATE PLAN REQUIREMENTS FOR CORE PROGRAMS

Adult, Dislocated Worker and Youth Activities under Title I-B

(a) GENERAL REQUIREMENTS

(1) Regions and Local Workforce Development Areas

[A] Identify the regions and the local workforce development areas designated in the State
The US Virgin Islands is a single state local workforce development area. Its population is approximately 104,000. There are two major Island districts that house two physical One-Stop Centers in order to accommodate access for all individuals. Services in each district including with all core and non-core partners mirror each other. The Virgin Islands operates as a single Region.

[B] Describe the process used for designating local areas; describe the process used for designating regions.
As a single state local workforce development area there are no local areas or separate regions designated.

[C] Provide the appeals process referred to in WIOA relating designation of local areas
There is no process required.

[D] Provide the appeals process referred to in WIOA relating to determinations for infrastructure funding.
There is no process required.

(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 policies and guidance for the workforce development system can be found on the Virgin Islands Workforce Board website at www.viwib.org.

[B] Describe how the State intends to use Governor’s set aside funding. Describe how the State will utilize Rapid Response funds.
The set-aside funding will be broken into two categories – system evaluation and innovative programming. The system evaluation piece will assess the entire system for effectiveness and be
used to gauge continuous improvement. The evaluation is still being developed but will be available for use by the end of the first year of implementation. Several options for innovative activity are being explored by the Workforce Board at this time to include alternative methods of providing foundational workplace skills with credentials.

Rapid Response funds will be used to supplement employer engagement efforts in response to lay-off aversion strategies. Employers will be made aware of this option through public service campaigns by literature or media or in general orientation to workforce services either by visiting the VIDOL website or through informal interaction with a business service representative. A business service representative may contact an employer known to be going through a hardship to initiate this discussion or such employer may make contact through the One-Stop Centers.

An employer or group of employers may request funds for Incumbent Worker Training as part of a layoff aversion strategy caused by undue economic hardships within a given sector or because of significant changes in the nature of an industry. Incumbent worker funds are solely for the purposes of providing training that upgrades employee skills levels or introduces new occupational skills required for an employee to remain effective in his/her position.

The training involved may include a mix of classroom training, technology-based learning and on-site training. Since the audience is already employed training will be industry specific and may occur wholly at the workplace. Training should be on an advanced level and result in either employer and/or industry recognized credentials. Professional level certification (where applicable) resulting in degree attainment is sought for professional services.

Incumbent workers may be eligible to receive additional One-Stop services consistent with possible job disconnection. Since training will take place as a layoff aversion strategy, it is possible that a lay-off or partial lay-off may still occur. To ensure that workers are prepared for any type of transition, they may have access to workshops on Resume Enhancement, Budgeting, and Time Management.

Incumbent worker customers may also have access to career counseling to help them identify ‘next steps’ in building careers. This will allow them to define skill sets, especially those that may be transferable to other occupations, and restructure their career goals to include additional/advanced academic or occupational skills training.

Additionally, incumbent workers have access to general One-Stop services to include information on Unemployment Insurance, Job Search and Training activities.

[C] Describe policies and procedures to provide Rapid Response in cases of natural disasters including coordination with FEMA and other entities.

The VI Department of Labor and other agencies in the Virgin Islands central government partner with the local Virgin Islands Territorial Emergency Management Agency (VITEMA) to
coordinate responses to natural disasters. The VI Department of Labor is currently updating its policies for addressing natural disasters and will include the role of Rapid Response in its development.

[D] Describe how the State provides early intervention to worker groups on whose behalf a Trade Adjustment Assistance petition has been filed.
The Virgin Islands does not have a Trade Adjustment Assistance program.

(b) ADULT AND DISLOCATED WORKER PROGRAM REQUIREMENTS

(1) Work-Based Training Models
The use of work-based training is integral to the Virgin Islands’ workforce development strategy. As the local workforce system continues to determine sector strategies and build career pathways a work based learning experience will be required for most participants specifically those who have had little to no previous experience in the workforce – out-of-school youth and adults with barriers. These customers can expect to have a six to twelve week work experience built into their career plan that allows them to put into practice the foundational workplace skills and/or occupational training that they have just acquired. Customers who have had some exposure to the workplace already such as older youth and dislocated workers are prime candidates for on-the-job training. These strategies allow both job seeker and employer customer the opportunity to provide hands on training in specific occupational areas which facilitates the long term commitment of both to advance on the job. It is expected that those who participate in on-the-job training will remain in that sector, possibly with the same employer for a time.

(2) Registered Apprenticeship
The Virgin Islands Department of Labor has applied for and is awaiting recognition on its status as an Apprenticeship Agency.

(3) Training Provider Eligibility Procedures
The policy and procedures for Training Provider Eligibility (Initial and Continued) can be found at the Workforce Board’s website [www.viwib.org](http://www.viwib.org) under the tab – Plans, Performance and Reports.

(4) Priority of Services for Public Assistance and Low-income individuals
WIOA Section 134(c)(3)(E) establishes priority to recipients of public assistance, other low income individuals and individuals who are basic skills deficient for receipt of career services and training services. The policy and procedures for the delivery of services and activities can also be found at the Workforce Board’s website.

**Adult Priority**
Priority of services shall be given to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient for receipt of career services and training services.
The Virgin Islands has always given priority to individuals who fit this definition. The electronic case management system defaults to this target group for determining eligibility. In addition, the VIDOL’s monitoring team reviews all contracts, ITA’s and agreements to ensure priority is given to this target group.

(5) Transfer of funds between adult and dislocated worker programs
The Territory will continue to utilize the transfer of funds between Adult and Dislocated Programs as it has in the past. Historically, the VI Workforce System has served more adult funded individuals than dislocated individuals and funds have been transferred as needed. The Territory has not yet established a policy on the transfer of funds between adult and dislocated worker programs.

(c) YOUTH PROGRAM REQUIREMENTS

(1) Criteria for Awarding grants for youth workforce investment activities
Providers of youth activities are not subject to the Individual Training Accounts policy or the Eligible Providers Certification system. Eligible providers of youth activities will be determined by contracts awarded through a competitive process, based on the recommendation of the Youth Committee of the Workforce Board and on the criteria as described in the Youth Transition Plan. An eligible provider list for youth activities will be developed and disseminated throughout the One-Stop system for providers of youth services approved through the competitive bidding process.

Proposals will be required to make assurances that the following are in place:
◊ Adequate technical and financial resources;
◊ A well defined program design that relates to the needs of the local economy;
◊ The ability to meet program design specifications at a reasonable cost;
◊ A satisfactory record of past performance; and
◊ A satisfactory record of fiscal accountability, organization and operational controls.

The disqualifying factors for bidders under the competitive process include:
◊ Providers with a history of poor past performance;
◊ Providers that fail to establish linkages to local market demands;
◊ Providers that fail to demonstrate adequate goals and structure in youth program design.

Evaluation factors are based on a hundred point scale and include:
Labor Market Status – The strength of the occupational area in terms of employment opportunities available, entry-level wages, upward mobility and stability of the industry – is occupational area demand driven? (15 points)
Program Design – The relevancy of the program design to the promised outcomes; type and mix of services as compared with the population to be served (30 points)

Reasonableness of cost – Reasonableness of the single unit charge in relation to the program goals and outcomes. (25 points)

Organization Capability – The organization’s overall capability including experience with serving at-risk youth; administrative capacity, available resources, and demonstrated effectiveness in past training (10 points)

Facilities, staffing, equipment – Accessibility of the training site to participants, the availability of appropriate equipment and the adequacy of the facility and the experience of staff. (10 points)

Youth Services – Ability of program to provide services to youth. Does provider regularly work with youth or is program a subset of Adult training? (10 points)

(2) Describe the strategies the State will use to achieve improved outcomes for out-of-school Youth

The Youth team at the Job Center has developed an interactive program that is being rolled out throughout the Territory directed at addressing the needs of out-of-school youth. The Work, Learn and Earn program is a twelve (12) week paid work experience for out-of-school youth aged 18-24 in which youth customers work for twenty (20) hours a week. During this time they will engage in work ready foundational skills development and career planning related workshops offered by the WIOA Youth team. At the program’s outcome each youth customer will:

- Learn the soft skills needed for Job Success;
- Be able to and complete at least one networking experience with local employers in the community;
- Complete a resume and cover letter;
- Be able to perform a self service search through the Virgin Islands Electronic Workforce System (VIEWS) to access current job openings;
- Participate in a work experience in a career sector of interest;
- Know how to use labor market information to determine career interest

(3) Describe how the State will ensure that all 14 program elements described in WIOA are made available and effectively implemented.

The system will utilize a multi-dimensional strategic approach to provide youth with workforce investment activities and services which align with the fourteen (14) program elements. Youth programs and activity will focus on ensuring that the WIOA provisions focusing 75 percent of program funds on out-of-school youth is met and achieved. Similarly, paid work experiences, pre-apprenticeships and on-the job training programs will highlight the approach taken by the system to achieve this desired outcome. Specific emphasis will be placed on services to the following out-of-school targeted population: high school drop-out; high school completers who
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are low-income, basic skills deficient or an English language learner; homeless; connections with
the juvenile system or adult justice system; pregnant or parenting, person with a disability; low
income in need of assistance to enter or complete an educational program or to secure or hold
employment.

The Youth team provides in-house academic and career assessments for WIOA Youth to
determine the services and activities needed for each young person. Individual Employment
Plans or Service Strategies are developed and referrals made to the service providers linked to
the program elements. The Youth team maintains a listing of Youth providers that specialize in
the provision of one or more Youth element. An RFP is released each year requesting proposals
from providers in the areas most in need. Due to the size of the Territory, many providers have
been with the Workforce System for many years and have adapted programming to
accommodate and/or expand the offerings based on the changes in WIOA.

(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 and for in-school youth.

The Virgin Islands definition for “requires additional assistance” developed by the Workforce
Board for both in-school and out of school youth provides additional eligibility factors that
enables the provision of services to at-risk youth.

In-school Youth, and
• Has exhibited poor attendance in an educational program during the last 12 calendar
  months; or
• Has been suspended from school during the last 12 calendar months; or
• Has been placed on academic probation during the current school year

Out of School Youth, and
• Has dropped out of a post-secondary educational program during the past 12 calendar
  months; or
• Has limited work history or no work history; or
• Has repeatedly been terminated from employment during the past 12 calendar 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 129 (a) (1) (C) (i)

In accordance with the Virgin Islands Code the Territory’s policy for attending and not
attending school is:

17 V.I.C. § 82. Compulsory school attendance; age of pupils; exceptions
(a) All children shall commence their school education by attending an approved kindergarten from the
beginning of the school year in the calendar year in which they reach their fifth birthday, and they shall
continue to attend school regularly until the expiration of the school year nearest their eighteenth
birthday, except as provided in section 287 of this title; provided, however, those who graduate from high
school before the age of 18 are excepted and students attending the National Guard Youth Challenge
(b) The Commissioner of Education, in conjunction with the Virgin Islands Board of Education shall promulgate rules and regulations to carry out this section no later than 12 months after the enactment of this section.

(6) If not using basic skills deficient definition contained in WIOA section 3 (5) (B), include the State definition. The Virgin Islands recognizes the definition as described in WIOA section 3 (5) (B) and adopts as follows:

The term “basic skills deficient” means, with respect to an individual—

(A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or

(B) who is a youth or adult, that the 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.

(d) SINGLE-AREA STATE REQUIREMENTS

(1) No comments have yet been posted

(2) The Virgin Islands Department of Labor is the entity responsible for the disbursal of grant funds as determined by the Governor of the Territory.

(3) Youth activity is available for both in-school and out-of-school youth who are eligible as per the requirements of WIOA 129 (a) (1) (B) and 129 (a) (1) (C) (iv). Programs are solicited through a competitive bidding process and are based on the fourteen program elements. A list of WIOA youth providers can be found at the VI Department of Labor’s website www.vidol.gov.

(e) WAIVER REQUESTS

The Virgin Islands has no requests for waivers at this time.

Title I-B Assurances

The State Plan must include assurances that:

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<tbody>
<tr>
<td>1.</td>
<td>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;</td>
</tr>
<tr>
<td>2.</td>
<td>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;</td>
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<tr>
<td>3.</td>
<td>The State has 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;</td>
</tr>
<tr>
<td>4.</td>
<td>The State established written policy and procedures to ensure local workforce investment</td>
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boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);

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;

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;

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);

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;

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;

10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.

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);

Wagner-Peyser Act Program (Employment Service)

(a) Employment Service Professional Staff Development

1) Professional development activities for Employment Service staff are an ongoing process. New staff undergoes orientation that describes the workforce system and employment services role in it. They learn how to use job search and matching techniques based upon demand occupation and local labor market information. Work readiness products and resources used to conduct workshops and seminars is shared with staff so that they can better assist their customers with choosing services and strategies that benefit them in a job search. Additionally, online training, webinars and direct training from industry experts is utilized to enforce trends, products or tools with demonstrated performance or new to the workforce system. New for the
Territory’s implementation of WIOA is the goal to have at least one third of the staff acquire industry credentials in workforce development during each program year until all staff are credentialed. This plan will be launched during program year 2016. All core program staff will be invited to participate in this professional training endeavor.

2) Program leads periodically conduct an assessment of staff’s knowledge and skill levels of UI and W-P programs. Quarterly sessions that update the respective staff of the others product, including any changes or upgrades are conducted. Both Unemployment Insurance and Wagner Peyser staff are co-located at the Workforce Center thus facilitating the interactivity between them. Front line staffs are trained to know eligibility requirements and basic information of both programs.

All UI claimants register for services with Wagner-Peyser at the time of entry to the Workforce System. Since UI staff is housed at the Job Center in both island districts, all customer eligibility determination is done by UI staff therefore any need for adjudication is done either at the time of application or by appointment at a later date.

(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

All UI customers are required to view an orientation video informing customers of their benefits and rights and procedures for filing a claim. They are then given the opportunity to ask questions of both the UI and W-P staffs on next steps, timelines or to clarify any information that was given.

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

Reemployment assistance is provided to UI claimants who have been profiled by UI staff. Claimants are referred to W-P staff for services which begin with an orientation to workforce services. Additional services include access to labor market information, career assessments and structured workshops such as job search techniques and resume building. Other unemployed individuals also have access to these and other services available at the Workforce Centers to include basic career services.

(d) Describe how the State will use W-P funds to support UI claimants and the communication between W-P and UI

1. Wagner-Peyser funds are used to support UI claimants and the communication process between UI and W-P through the provision of access to labor market information on Virgin Islands Electronic Workforce System (VIEWS).

UI claimants attend an orientation session that provides an overview of Wagner-Peyser, WIOA and other services available at the Job Center. Claimants are
encouraged to begin the job search process right away and utilize the resources
funded through W-P (job club, short-term prevocational training, career exploration
tools, etc.) to enhance their job preparation and search.

2. The flow of services at the Territory’s Workforce Centers have all customers
registering with W-P to search for jobs prior to filing a UI claim; therefore all
customers have knowledge of and access to jobs available in local demand
occupations as well as other jobs that are listed with the Virgin Islands Department
of Labor that they may have interest in pursuing.

3. Customers are determined “able and available” to work as established by the
requirement to register with W-P before they file a UI claim. W-P staff initiates
the UI claim process and claimants are later called back by a UI staff person for
further processing of their claim.

An initial assessment which is comprised of a review of job skills and
qualifications, work experience and employment availability in requested
occupational field is conducted to determine job readiness and availability.

4. The Eligible Training Provider list is available at all Workforce Center locations
and on the VI Department of Labor’s website. Customers who are interested in
attending training either as a refresher or to acquire new skills work with workforce
career counselors to develop a training plan and schedule training and other
services that may be needed to attain employment.

Customers seeking UI benefits register under Wagner-Peyser at the time of entry
into the Workforce System. Job search activities begin immediately and are done
concurrently with application for UI benefits. Wagner-Peyser staff tries to match
customers with available jobs based on their work history and qualifications. If it
is determined that additional training will be required for employment sought,
customers are referred to a Workforce career representative who works with the
individual on developing an Individual Employment Plan or Service Strategy.
Training may be selected by the customer and referrals are made by the career
representative once prerequisites are met.

(e) Agricultural Outreach Plan
The Virgin Islands does not participate in the AOP program.
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))

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;

3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department of agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and

4. State agency merit-based public employees provide Wagner-Peyser Act funded labor exchange activities in accordance with Department of Labor regulations.
Adult Education and Literacy Programs

(A) Aligning of Content Standards

The Virgin Islands Department of Education Division of Adult Education will align adult education content standards with the territory adopted Common Core state Standards (CCSS), through the adoption and implementation of the College and Career Ready (CCR) Standards for Adult Education that were dispersed through USDOE. The CCR standards are the result of a practice that examined the CCSS from the viewpoint of adult education. The CCR standards reflect a broad agreement among subject matter experts in adult education about what is required for adult students to know to be prepared for the rigors of post-secondary education and training.

Qualified providers will be required to include these standards to maximize the effectiveness of curricula and instruction, and to prepare students for transition to post-secondary education and/or the workforce. In order to ensure that all instructors are knowledgeable of CCR Standards, and that they understand how to use them effectively to guide classroom instruction, the State Office of Career, Technical, and Adult Education will provide professional development to all instructional staff in presently funded programs, and to any prospect adult education grantees. At the adult secondary level, adult high school credit programs implement the same course descriptions and standards as those used in the K-12 educational system. GED® preparation courses are also a component of the Virgin Islands adult secondary level programming and are also aligned to the Common Core Standards.

A high school equivalency diploma is issued in the Virgin Islands to candidates who successfully demonstrate competency in language arts (reading and writing), mathematics, science, and social studies. The assessment used for the diploma program is the 2014 GED® Test.

(B) Local Activities

The State Office of Career, Technical and Adult Education is responsible for administering funds to suitable providers, and providing program performance oversight to sub-grantees. Funds will be provided to eligible local entities for the provision of adult education services. An eligible provider is an organization that has established effectiveness in providing adult education activities to qualified individuals and may include:

- A public or private non-profit agency
- A public housing authority
- A community–based or faith based organization
- A local education agency
- A consortium or coalition of agencies, organization, institutions, libraries, or authorities.

Qualified individuals are individuals who are 16 years of age, 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.

<table>
<thead>
<tr>
<th>ADULT GENERAL EDUCATION PROGRAMS AND COURSES</th>
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<tbody>
<tr>
<td><strong>Adult Basic Education (language arts, mathematics, and reading) Program</strong></td>
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<tr>
<td><strong>Adult High School Program</strong></td>
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<tr>
<td><strong>GED® Preparation Program</strong></td>
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<td><strong>Adult ESL Course</strong></td>
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<td><strong>Citizenship Course</strong></td>
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(This course is not supported with federal funds and not reported for NRS purposes)
Special Rule
The Virgin Islands State Office of Career, Technical, and Adult Education will 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 the agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities.

If family literacy activities are provided, the eligible provider shall attempt to coordinate with other agencies that provide program and services that are not included in Title II funds. This should occur prior to using funds for adult education and literacy activities other than activities for eligible individuals.

Workforce preparation activities means activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of post-secondary education or training, or employment.

Funding Opportunities
The Virgin Islands Department of Education will accept applications for all eligible applicants to fund Adult Education and Family Literacy services in the St. Thomas/St. John and St. Croix Districts in accordance with applicable Public Law Title II, Adult Education and Family Literacy Act (AEFLA). Non-profit entities will be required to have proof of tax exempt organization status under 501 (c) (3) of the Internal Revenue Code.

Purpose
The purpose of the sub grant award is to provide Adult Education and Literacy programs in the US Virgin Islands that will assist adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency; assist adults who are parents to obtain the skills necessary to be partners in the education of their children; assist adults in the completion of a secondary school education. Title II, Adult Education and Family Literacy Act provides funding through a Consolidated Grant to the VIDE for Adult Basic Education and Literacy services programs that will help break the cycle of poverty and illiteracy by improving educational opportunities of low income families. Each eligible provider receiving a sub grant from the Virgin Islands Department of Education shall use the sub grant to establish or operate one or more programs in the St. Thomas/St. John District, St. Croix District or both that provide services or instruction in one or more of the following categories: Adult Education and Literacy
services including workplace literacy services; family literacy services; and or English Literacy programs; for individuals interested in improving their education and employability skills.

**AEFLA, Section 231 (b)**
Awards will be subject to availability of funding from the US Department of Education.

**Time Period**
The period will be assigned for the period of (2) two years.

**Required Local Activities**
Eligible providers receiving sub grant award are required to:

1. Obtain a WIOA Approved MIS System to comply with State, Federal and National Reporting System (NRS) mandates.
2. Use the grant to operate one or more programs that provide services and instruction in one or more of the following categories:
   - Adult Education and Literacy services, including workplace literacy services
   - Family Literacy services (as described in section 203 of the AEFLA
   - English Literacy programs that incorporate elements of civics and citizenship

Also included under types of instruction:
- Adult Basic Education (ABE) is instruction for adults whose literacy skills are at approximately the high school level and who are seeking to pass the General Educational Development (GED) tests or obtain an adult high school credential.
- English Literacy (EL) is instruction for adults who lack proficiency in English and who seek to improve their literacy and competency in English. English literacy instruction is sometimes integrated with civics education (EL/Civics).

**Statutory Considerations**

**AEFLA Section 231**
In awarding sub grants, the Virgin Islands Department of Education and the VI Workforce Investment Board will consider the following factors:

1. The degree to which the eligible provider will establish measurable goals for participant outcomes
2. The past effectiveness of an eligible provider in improving the literacy skills of adults and families. After the 1 year period beginning with the adoption of an eligible agency’s performances measures, the success of an eligible provider receiving funding under the subtitle in meeting or exceeding such performance measures, especially with respect those adults with the lowest levels of literacy
3. The commitment of the eligible provider to serve individuals in the community who are most in need of literacy services, including individuals who are low income or have minimal literacy skills;

4. Whether or not the program—(A) is of sufficient intensity and duration for participant to achieve substantial learning gains; and (B) uses instructional practices such as phonemic awareness, systematic phonics, and fluency and reading comprehensions that research has proven to be effective in teaching individuals to read.

5. Whether the activities are built on a strong foundation of research and effective educational practice;

6. Whether the activities effectively employ advances in technology, as appropriate including the use of computers;

7. Whether the activities provide learning in real life contexts to ensure that an individual has the skills needed to compete in the workplace and exercise the rights and responsibilities of citizenship;

8. Whether the activities are staffed by well-trained instructors, counselors and Administrators

9. Whether the activities coordinate with other available resources in the community such as by establishing strong links with elementary schools and secondary school, postsecondary education institutions, one stop centers, job training programs, and social service agencies;

10. Whether the activities offer flexible schedules and support services (such as child care and transportation) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

11. Whether the activities maintain a high quality information management system that has the capacity to report participant outcomes and to monitor program performance against the eligible agency WIOA performance measures; and

12. Whether the local communities have a demonstrated need for additional English literacy programs

13. The extent to which eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan (463.20(d)(4))
In order to receive funding, applicants must satisfactorily address all thirteen considerations.

Eligible Participants

The following local providers are eligible to participate in the application process for federal Adult Education and Family Literacy funds: Local educational agencies; community based organizations of demonstrated effectiveness; volunteer literacy organization of demonstrated effectiveness; institutions of higher education; public or private nonprofit agencies; libraries; public housing authorities; nonprofit institutions that are not described in any of these descriptions and have the ability to provide literacy services to adults and families; and a consortium of the agencies; organizations and nonprofit institutions to include nonprofit faith based organizations. For profit entities will not be eligible.

Successful provider receiving sub grants under AEFLA are required to obtain a Management Information System to comply with State and Federal National Reporting Systems (NRS) enrollment information will be provided at orientation.

The Virgin Islands Department of Education maintains a record of eligible past providers in the state who might offer Adult Education and Literacy Services. A request for Proposal (RFP) including and application packet, will be prepared and public notice will be given to the general public and interested parties.

The request for proposals will be an 8 month period or a period negotiated by between the VI State Office for Adult Education and the VI Workforce Investment Board. Newspapers, websites and commonly used medium will be used to advertise the availability of funding and proposal information. Training of Recommendation panel will be further reviewed by the State Office for Adult Education and the VIWIB. Reminders of deadlines for Applications will be posted with the final month of RFP acceptance. The process of reading and rating the proposal will be followed by the notification and successful selection process.

Evaluation of Applications

Teams use an evaluation tool with specific criteria to determine whether the proposed applications will meet the specific requirements set by US Department of Education as set in Section 231 of Title II of the Workforce Investment Act and the VI Department of Education. All proposals must also submit a reasonable budget with at least a 10% local match. Applications will be read and rated a minimum of three times by trained grant readers. No grant will be funded unless it has met a minimum score of 70 points.

Number of Sub Grants

The number of sub grants funded will depend on the number applicants, number of centers and funds available.
Adult Education – State Administration

Purpose- To implement all facets of the Virgin Islands Adult Education State Plan based on the extension of the Adult Education and Family Literacy Act. Inclusive of the State responsibilities of the State Office is to ensure that performance levels of adult education programs are competitive grants for community agencies, monitoring and providing of technical assistance to designated personnel.

The State Office responsibilities encompass overseeing all aspects of Adult Education programs such as workplace literacy, family literacy, and English literacy programs, one stop delivery systems performance reporting for eligible providers. Additionally, the State would be responsible for the evaluation and review of outcomes achieved by each local program. Assessments of progress made in achieving State goals for Adult Education will be handled by reporting of findings at the National level.

Evaluation of Applicants

Sub Grantee applications will be evaluated on the basis of

1. How satisfactorily the thirteen considerations are addressed
2. The Applicants inclusion of the following required information;
   - A description of how funds awarded under this subtitle will be spent and
   - A Description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organization for the delivery of adult education and literacy services

3. The applicant’s demonstration of their ability to provide the necessary services including;
   - Services to assist adults to become literate and obtain the knowledge and skills necessary for employment and self sufficiency
   - Services to assist adults who are parents to obtain the skills necessary to become partners in the education of their children; and
   - Services to assist adults in the completion of secondary education

Management Control of the Program

The Sub grantee has complete management responsibility for this sub grant. While the VIDE Staff may be consulted, they will not be directly responsible for the selection of the sub grantee or vendors, nor will they be directly involved in the expenditure and payment of funds.
The Sub grantee has complete management responsibility for the fulfillment of the projected outcome of the program expressed within the submitted application as it related to student educational gains, total students served and any of other measurable projections made by the applicant in securing the award.

The sub grantee award can be reduced by the grantee (VIDE) in the event that projected target population participation or other projected outcomes have not been realized by the sub grantee and a Corrective Action Plan (CAP) was not submitted to the state; was not executed; or did not correct the condition.

**Sub grantee Award Decisions and Disposition of Applications**

The VIDE reserves the right to award in part, to reject any and all application in whole or in part, and to waive technical defects, irregularities or omissions if is in its judgment, the best interest of the US Virgin Islands would be served. After receiving the sub grant application and after the VI Workforce Investment Board issue recommendations, the Virgin Islands Department of Education (VIDE) reserves the right not to award all sub grants, to negotiate specific sub grant amounts, and to selects certain sub grantees regardless of points awarded as part of the evaluation process to meet federal requirements or the VIDE priorities. In addition, the VIDE reserves the right to change the dollar amount of sub grant awards to meet federal guidelines for sub grant awards.

Applicants will be notified, in writing of the acceptance or rejection of their applications. If a provider is selected for funding, the VIDE will initiate a sub grant award letter. The level of funding and effective dates of the programs will be set forth in the notification of the sub grant award. All applications submitted will be retained by the VIDE and will become part of the public domain.

All awards are subject to availability of federal funds. Sub grants are not final until a VIDE and applicable Third Party Fiduciary **Purchase Order** and award letter is executed.

**Application Contents**

The sub grant application must be double spaced and include the following completed sub grant sections in order to be considered:

A. Signed sub grant Application cover page
B. Application Abstract (no more than on page)
C. Application Narrative:
   - Need for Project (2 pages maximum)
   - Adequacy of Resources (2 pages maximum)
   - Program Management plan (2 pages maximum)
   - Program Evaluation (2 pages maximum)
D. Budget and Budget Narrative (2 pages maximum)
E. Certificate of Good Standing issued, license to operate in the US Virgin Islands or 501 9c)(3) letter (whichever is applicable)
F. Signed and dated Statement of Assurances;
G. Funding History and Experience (2 pages maximum)
H. Signed and Dated Certifications Regarding Lobbying (B-10)
I. Signed certification Regarding Debarment (B-11)

The following components must be included in the application:

A. Need for Project (2 pages maximum)
   1. The extent to which the proposed project will provide services or otherwise address the needs of the adult population.

   Guidance for applicants: Provide a description of your community and the extent to which the proposed project is appropriate to and will successfully address the needs of the target population. In doing this, you may:
   a) Cite the factors that place adult students at risk; from becoming literate and obtain the knowledge and skill necessary for employment and self-sufficiency; prevent parents from obtaining the skills necessary to become partners in the education of their children; and prevent adults from completion of secondary school education.
   b) Describe how the proposed project will remedy the risk factors for each target population. Applicants are advised that a needs assessment may be helpful in determining the needs of the community and the gaps in the services that are available. The services to be provided should be closely tied to the identified needs.

B. Quality of Design (2 pages maximum)
   The extent to which the goals, objectives and outcomes to be achieved by the proposed project are clearly specified Project Design and measurable.

C. Adequacy of Resources (2 pages maximum)
   1. The adequacy of support, including facilities, equipment, supplies, and other resources from each of the partnership organization.
   2. The extent to which the costs are reasonable in relation to the number of students to be served and to the anticipated results and benefits.
   3. The extent to which items purchased are allowable under selected cost of item listed (OMB Omni Circular A-87)
   4. The extent to which the activities are allocable to the needs of the local program and curriculum

   Guidance for applicants: Show that appropriate resources and personnel have been carefully allocated for the tasks and activities described in your application.
Successful applicants must ensure that their budget will adequately cover program expenses. It is important to demonstrate how you will leverage existing school resources, such as computer labs, libraries, and classrooms to carry out your activities. Also describe the resources that partners that are contributing, such as the use of community recreational areas, staff, supplies, etc. You are advised that costs should be allocation and will be judged against the scope of the project and its anticipated benefits. Applicants should provide evidence that the plans have the support of program designers, service providers and participants.

**Program Management Plan** (2 pages max)

1. The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines and milestones for accomplishing project tasks.

   Guidance for applicants: Charts, timetables and position descriptions for key staff are particularly helpful in describing the structure of your project and the procedures for successful managing. We recommend that you clearly spell our objective, activities, events, beneficiaries, and anticipated results. Many successful projects budget for, and employ a project director and seek guidance from a variety of members of the community. Also, you must address the issue of planning for sustainability after the grant period and elaborate upon how your school district, community based organization and partnering organizations will assist in sustaining the project. Successful applicants should describe the role and responsibility of all key staff and how they plan for and provide resources for ongoing staff development and training.

(C) **Corrections Education and other Education of Institutionalized Individuals**

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 Virgin Islands State Office of Career, Technical, and Adult Education (SOCTAE) will spend no more than 10 percent of the funds used to award grants and contracts under section 231 for activities under section 225. Funding allocations will be determined as part of the planning process for implementation of WIOA. Adult education programs offered in correctional institutions include ABE, GED® Preparation, and ESL. Individuals also participate in career exploration and planning activities to develop a career and education plan based on career goals.
A correctional institution includes any prison; jail; reformatory; detention center; or halfway house, community-based rehabilitation center, or any other similar institution designed for the confinement or rehabilitation of criminal offenders. A criminal offender is any individual who is charged with or convicted of any criminal offense.

As required by WIOA, individuals who are likely to leave the correctional institution within five years of participation in the program are eligible for enrollment in adult education programs. Presently, persons over the age of 16 assigned by Court Order that are required to complete Adult Education are accommodated in order to fulfill Court mandates. Additional, VIDE has assisted Adult Education Administrators with funding testing and programs for inmates. However, additional time is needed to complete a revised plan of action to address Prison Population needs immediately.

Additionally, new plans are underway to provide Continuing Education and Career Pathways for newly released persons. Additional time is needed to gain more information on plans and timelines for implementations along with guideline and curriculum alignment to local programs.

(D) Integrated English Literacy and Civics Education Program

Integrated English Literacy and Civics Education Program will be supported by local information and activities presented through History and Cultural Education Divisions. These activities will be integrated to the Adult Education Curriculum.

Civics Education can be integrated into the English Literacy programs by encouraging Principals and Teachers and Partner Local Educational Agency sub grantees to focus on topics related to Civics for conversations and discussion content in the classroom. Principals, Administrators, Executive Directors will need to ensure that reading materials and corresponding information is Grade level appropriate for the ability of the learner.

(E) State Leadership

SOCTAE will use funds made available under section 222(a) (2) for the following adult education and literacy activities to develop or enhance the adult education system of the State. Not more than 12.5 percent of the grant funds made available will be used to carry out State leadership activities under section 223. The mandatory leadership activities are:

1. Alignment of adult education and literacy activities with core programs and one-stop partners, including eligible providers, including the development of career pathways to provide access to employment and training services for individuals in adult education and literacy activities.
SOCTAE will work collaboratively with other core programs and partner agencies to provide comprehensive and wraparound services to program participants. State-level policy and planning bodies provide an opportunity for Adult Education to work with Virgin Islands Department of Labor (VIDOL) and other key agencies defined in the law. Adult Education will provide resources and services through One-Stop Centers (including intake/orientation for Adult Education services, and transition resources), referral processes, and other joint mechanisms developed through agency partnerships.

2. **The establishment or operation of high quality professional development programs (section 223(a)(1)(B) of WIOA)**

SOCTAE will provide targeted professional development based upon a statewide needs assessment, research regarding best practices, and federal recommendations. SOCTAE will survey local providers to ascertain areas in which there may be a gap in knowledge or a need for improvement. From these results, SOCTAE will coordinate and execute broad-based training through a variety of modalities to assist program leaders and teachers in areas such as program improvement, instructional techniques, integrated education and training, CCR standards, transition to post-secondary education and employment, and the infusion of technology into instruction. Professional Development may include:

- An annual operations meeting, wherein local program administrators are given an overview of changes in policy and related practices, budget management, and reporting requirements;
- An annual statewide professional development conference for a variety of adult education personnel;
- Webinars/Teleconferences

3. **Technical Assistance**

SOCTAE will deliver technical assistance to eligible providers to enhance program effectiveness, increase the ability of providers to meet established performance standards, and fulfill obligations associated with being a one-stop partner. SOCTAE will provide professional development/technical assistance via phone, webinar, teleconference, on-site training, and seminars. Targeted technical assistance will focus on areas of national interest such as recruitment and intake, student engagement, data management and reporting, testing procedures, and transition to post-secondary education and employment. To ensure that local providers are adequately equipped to foster continuous improvement and maintain an ability to meet the needs of the Virgin Islands workforce, SOCTAE will:

- Deliver technical assistance to increase the ability of instructors to provide impactful instruction and obtain desired results in key areas.
- Provide State and local level information regarding the role of adult education as a key component in the delivery of one-stop center services.
- Provide training related to the use of technology to improve classroom effectiveness and program outcomes.
4. The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities and the dissemination of information about models and proven or promising practices within the State.

SOCTAE will engage in island-wide program monitoring procedures to maintain sufficient knowledge and oversight of local adult education providers. Oversight will include continuous data monitoring, in addition to site visits and on-site reviews. Specific attention will be given to programs with low performance. OAE will develop targeted technical assistance to meet the specific needs of the program in need of improvement.

The State Office for Adult Education will continue to assist with the development of curricula in order to incorporate the essential components of reading that relate to adult activities such as family literacy and civic education.

In conjunction with Partners programs and recommendations from the Workforce Investment Board, we will continue to develop a more complete model of careers pathways programs for each level.

Memorandums of Agreements will continue to be implemented under existing and new Partnership agreements to continue the facilitation of the completion of Adult Basic and Adult Secondary level courses to Post Secondary programs.

(F) Assessing Quality

SOCTAE uses various means of assessment in its annual and ongoing evaluation process, including site monitoring visits, desk monitoring, program improvement processes, and performance and financial audits. The results of these processes determine program improvement actions.

Monitoring

SOCTAE will implement a Quality Assurance System that will assure student performance improvement, financial accountability, program quality, and regulatory compliance of local providers in accordance with federal laws and regulations, state statutes and rules, and the provisions of an approved grant award.

The monitoring component of the Quality Assurance System is risk-based. Risk assessment is a process used to evaluate variables associated with workforce education grants and assign a rating for the level of risk to the Virgin Islands Department of Education (VIDE) and SOCTAE associated with each provider. In order to complete a risk assessment, certain risk factors have been identified which may affect the level of risk for each agency. A risk matrix is completed for each provider. The annual risk assessment is conducted by the quality assurance team to determine the monitoring strategy appropriate for each provider. A range of monitoring strategies includes
conference calls, improvement plans; grant reviews, etc., with the more comprehensive strategy such as an onsite visit, designated for providers deemed to be at higher risk.

The State Office for Adult Education has in place a monitoring tool that assesses each component of the Adult Education program. Curriculum, Program performance, Enrollment, expected Outcomes, and reporting are all assessed through the Monitoring tool. Professional Development services have been identified both locally and nationally to enhance performance levels in each area. (1) Instruction in the essential components of reading instruction will be guided by National Common Core Standards for Adult Education as well as traditional Common Core Standards. (2) Instruction related to the specific needs of adult learners will be guided by Placement Tests results and Common Core State Standards for Adult Education. Partner Agencies will be consulted especially when Memorandum of Agreements are in place to serve a particular population. (3) Instruction provided by volunteers or paid personnel will be guided by designated Principals, Administrators or Directors of the noted Local Educational Agency and will be part of monitoring and performance assessments. (4) The dissemination of information about models and promising practices will continue through recommended Partnerships and available services both locally and nationally to enhance teaching techniques and quality of instructional material. All persons associated with the program will be included in mass emails with information on promising practices and links for educational improvements.

**Actions taken to improve quality**

If non-compliance finding(s) are identified, a corrective action plan will be implemented. The corrective action plan must identify the findings and specific strategies the provider will implement to ensure finding(s) have been resolved.

In addition to program improvement plans and other actions taken to improve quality, the following activities are available:

**New Director Training**
Provides new directors with information such as federal and state guidelines, data collection and NRS reporting, and resources needed to administer their programs

**TABE and Training/Trainers**
Through ongoing training, a network of trained professionals ensures the uniform administration and reporting of assessments used for determining federal level gains.

**Data Reporting and Program Improvement Training**
Provides training on the fundamentals of the NRS. Topics include monitoring, data analysis and collection, types of data and measures, assessments, data quality, and related information.

**Technical Assistance**
Adult education calls to inform adult educators of program changes, reporting announcements, and opportunities to ask questions of the SOCTAE staff.
Teacher Training
Provides information and resources to support instruction in the areas of GED preparation, college and career readiness, career awareness and planning, career pathways, reading and math instructional strategies

Program Evaluation (2 pages max) 1. The extent to which the methods of evaluation include the use of objective performance measures that are clearly related to the intended outcomes of the project and will produce quantitative and qualitative data to the extent possible.

Guidance for applicants: Submit a strong evaluation plan that will shape the development of the project from the beginning of the grant period. The plan should include the program objectives and performance indicators, clear benchmarks to monitor progress toward specific objectives and outcome measures to assess impact on adult student learning. The plan should identify the individual(s) and or organization(s) that have agreed to serve as the evaluator for the project and describe his/her/its qualifications. The plan should describe the evaluation design, indicating: (1) types of data that will be collected; (2) when various types of data will be collected; (3) what designs and methods will be used; (4) what instruments will be developed and when; (5) how the data will be analyzed; (6) when reports of results and outcomes will become available; and (7) how information will be used by the project to monitor progress and to provide accountability information to stakeholders about success at the project site(s).

Annual Performance Report and Evaluation Requirements

Each year, sub grantees are required to submit an Annual Report (APR) that describes project activities, accomplishments and outcomes. The two purposes of the APR are to; (1) demonstrate that substantial program has been made toward meeting the objectives of the project as outlined in the sub grant application and (2) collect data that addresses the performance indicators for the AEFLA program and WIOA Core Partner common indicators.

All Sub grantees will be monitored by the VIDE to ensure compliance to all Federal and State mandates and procedures. Programs will be monitored with the use of VI monitoring checklist (Appendix H of Implementing Guidelines (Measures and Methods for National Reporting Systems for Adult Education).

Obligations of Sub Grantees

All applicants are hereby notified that the sub grant to be awarded is subject to contract compliance requirement of the Virgin Islands Department of Education. Furthermore, the sub grantee must submit periodic reports of its employment and sub-contracting practices in such form, in such manner, and in such time, as may be prescribed by VIDE.

Freedom of Information Act

All of the information contained in applications submitted in response to Announcements is subject to the provisions of the Freedom of Information Act.
**STATE UNIFIED PLAN – US Virgin Islands**

**Adult Education and Family Literacy Act Program Certifications and Assurances**

<table>
<thead>
<tr>
<th>States must provide written and signed certifications that:</th>
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<tbody>
<tr>
<td>1. The plan is submitted by the State agency that is eligible to submit the plan;</td>
</tr>
<tr>
<td>2. The State agency has authority under State law to perform the functions of the State under the program;</td>
</tr>
<tr>
<td>3. The State legally may carry out each provision of the plan;</td>
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<tr>
<td>4. All provisions of the plan are consistent with State law;</td>
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<tr>
<td>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;</td>
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<tr>
<td>6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;</td>
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<tr>
<td>7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and</td>
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<tr>
<td>8. The plan is the basis for State operation and administration of the program</td>
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<th>The State Plan must include assurances that:</th>
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<tbody>
<tr>
<td>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 supplemental and not supplant provisions);</td>
</tr>
<tr>
<td>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;</td>
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<tr>
<td>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;</td>
</tr>
<tr>
<td>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;</td>
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<tr>
<td>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</td>
</tr>
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</table>
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.
VOCATIONAL REHABILITATION

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan 13 must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA: 13 Sec. 102(b)(2)(D)(iii) of WIOA
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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 VISRC recognizes the diligent efforts of the VR Team for their support to the Council members’ in helping the council to move forward in a productive manner as to better understand and respond to mandates of the Workforce Innovation and Opportunity Act (WIOA) while navigating in a rapidly changing system. Although WIOA measures are being established and the rule development is still in process, the VISRC supports high standards and expectations in every area of the VR system.

The VISRC is committed to the growth and strengthening of its partnership with the VIDDRS. We are supportive of Virgin Islands Division of Disabilities and Rehabilitation Services (VIDDRS) efforts to provide services to transitioning youth. The Recruitment of new SRC members continues to be a challenge. VISRC continues to work in partnership with the VIDDRS to expand membership; focus is being placed on recruitment of current or former applicants for, or recipients of vocational rehabilitation, more individuals representing business, industry, and labor, and also a representative of the State workforce investment board.

The VISRC sponsors annual forums for the evaluation of the VR agencies performance based on goals and policies that have been implemented; it also gives interested parties an opportunity to provide VI SRC with input to guide its efforts throughout the fiscal year. The VISRC also sponsors the events for the National Disability Employment Awareness Month, acknowledging and recognizing both clients and employers who have utilized the programs offered by the VIDDRS and had successful employment outcomes.

While VISRC is encouraged with VIDDRS efforts to engage community stakeholders it is recommended that the VIDDRS develop and implement a comprehensive outreach plan. Additionally, the VISRC supports the VR’s efforts to implement a client case management system as this will facilitate more efficiency in the overall management of the program.

2. the Designated State unit's response to the Council’s input and recommendations; and

VIDDRS has reviewed the comments and input from the VI SRC and are in agreement with their recommendations/concerns. VIDDRS has an “open door policy” and will continue to encourage the VISRC to share concerns throughout the year.

3. the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

N/A
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 Virgin Islands Vocational Rehabilitation Program is not requesting a waiver of statewideness.

2. the designated State unit will approve each proposed service before it is put into effect; and

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.

N/A

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 Virgin Islands Vocational Rehabilitation program continues to cooperate with entities not in the State Workforce System. The Virgin Islands University Center for Excellence on Developmental Disabilities (VIUCEDD), in conjunction with Banco Popular provides low interest loans to purchase assistive technology devices for individuals with disabilities. They also present mini–workshops on disability related issues. Periodically, they offer sign language training to companies in the community. Self–advocacy training for persons with disabilities is also provided. The St. Croix Career & Technical Educational and the Wheatley Skills Centers are operated by the Department of Education. They provide vocational and technical training in areas such as typing, computer repair, auto and diesel mechanic, cosmetology, food and beverage management, upholstery, carpentry, and many other vocational courses.

Vocational Rehabilitation clients who demonstrate interest and potential are referred to both facilities for training. The Child Care Block Grant Program is a division within the Department of Human Services through which eligible mothers receive assistance with child care while actively seeking employment. This service extends after they have been placed in employment. Small Business Development Center (SBDC), is an entity with whom we have developed a working relationship. As part of our Entrepreneurship Services to qualified VR Clients, it is required that a business proposal be developed with the assistance of the SBDC. Clients who are interested in the Business Enterprise Program are required to attend seminars sponsored by
SBDC. The Vocational Rehabilitation Program in collaboration with its partners, (Department of Labor, and the Virgin Islands University Center for Excellence in Developmental Disabilities (VIUCEDD) and the UVI Cooperative Extension Service (UVI–CES) who also hosted the camp on the UVI St. Thomas campus) co–sponsored an agricultural summer enrichment program. The students participated in numerous field trips and engaged in a wide variety of learning and fun–filled activities to further stimulate their interest in agricultural areas. The six week program was designed to increase knowledge and create awareness of career and work opportunities in the field of agricultural science. The second objective of this initiative was to equip the participants with job preparation skills through classroom presentations, practical exercises and field activities. This summer, the program will be expanded to include the LEA as a partner. The designated State Unit strives to maintain a professional relationship with the Client Assistance Program locally known as the Disability Rights Center of the Virgin Islands. They are invited to participate in workshops and VR sponsored events, VR is also invited to participate in parent forums and other activities as appropriate.

VR will provide supported employment services for individuals with the most significant disabilities, including youth, to achieve the employment outcome of supported employment in competitive integrated employment. This will be achieved through the expansion of our supported employment initiative to include the University Center for Excellence in Developmental Disabilities (VIUCEDD). Additionally, Independent job coaches will provide supported employment services for up to 24 months, with the option to increase as needed in special circumstances for up to four years post placement. VIDDRS will continue to partner with the VI Department of Labor to ensure that a sound business engagement strategy is implemented to maximize opportunity for sustainable relationships and employment opportunities with businesses in the community. VIDDRS will utilize existing partnerships and establish new partnerships in the private sector to facilitate these extended services.
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2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

N/A

3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

N/A

4. Non-educational agencies serving out-of-school youth; and

5. State use contracting programs.

N/A

d. Coordination with Education Officials

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.

Many employers in the Territory have identified skill gaps in the workforce in three specific categories: Soft Skills - to include customer service, punctuality and time management Basic Academic foundational Skills - specifically math, writing and verbal language efficiency Low Technological Skills - limited basic fluidity, limited knowledge of applications and web based navigation Utilizing this information, VIDDRS is at the table with stakeholders of the local education agency to complete the development of a collaborative Transition Services Procedure. VIDDRS and the LEAS continue to work collaboratively to develop a seamless process which will clearly identify the procedures for application, eligibility determination and provision of transition services, including pre-employment transition services for VR eligible students. The process ensures the Development and Approval Process for the IPE prior to students exiting school.

VIDDRS will provide technical assistance to counselors on strategies for timely determination of eligibility and development of IPEs for youth with disabilities to ensure that the IPE is developed before the student leaves high school.

VIDDRS will hold regular (bi-weekly) case reviews to provide a forum for counselors to discuss and share strategies that have been successful in addressing challenges.
VIDDRS will implement a plan for identifying cases at day 45 for which eligibility has not been determined as follows: Transitioning applicants will be identified and flagged upon receipt of referral; cases that have been in applicant status for over 30 days will be reviewed and appropriate action taken. Once eligibility has been determined:

DRS will monitor IPE development based on 90 days as stated in our policy manual. Quarterly case reviews will be conducted within the last two weeks of December, March, June, September to determine compliance with requirements for timely determination of eligibility and development of IPE. The goal is for 100% of IPEs to be developed within 90 days of eligibility determination.

VIDDRS is committed to building its capacity to provide extended services for individuals with the most significant disabilities, including youth, to achieve the employment outcome of supported employment in competitive integrated employment. VIDDRS is in the trial stages of partnership with the University of the Virgin Islands to develop innovative pathways that will allow individuals to access support services in "non-traditional" ways, while helping to build the foundation for achievement of sustainable accomplishments. Independent job coaches may provide supported employment services for up to 24 months, with the option to increase as needed in special circumstances. VIDDRS policies and procedures will be updated to reflect updated WIOA authorizations for extended services.

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;

Interagency Agreement

1. PURPOSE

This Joint Interagency Agreement for Secondary Transition Services (hereinafter “Agreement”) is designed to improve cooperative and collaborative efforts between the Virgin Islands Department of Education, as the State Educational Agency, through the State Office of Special Education (“VIDE/SOSE”) and the Department of Human Services, through the Division of Disabilities and Rehabilitation Services (herein after “VR”). The Agreement shall ensure that each student with a disability in the territory who needs special education and/or vocational rehabilitation services is promptly identified and the appropriate transition services are made available.
II. AUTHORITY

VIDE/SOSE
VIDE/SOSE is charged with the responsibility of ensuring that each eligible student with a disability is provided with a free appropriate public education in accordance with the Individuals with Disabilities Education Improvement Act (“IDEA 2004”), 20 USC § 1400; and

- IDEA also requires VIDE/SOSE to provide transition planning and services which will prepare students with disabilities for transition from school to post-school life; [34 CFR 300.1(a)] [20 U.S.C. 1400(d)(1)(A); and
- VIDE/SOSE is required to ensure that an interagency agreement or other mechanism for interagency coordination is in effect between each non–educational public agency as required by the IDEA [20 USC § 1412(a)(12)], in the provision of a free appropriate public education to eligible students with disabilities; and
- IDEA requires participating states and territories to have in place an agreement or mechanism to: (i) identify the state agency responsible for providing services that are also special education and related services to ensure a free appropriate public education; (ii) specify the terms and conditions under which responsible agencies reimburse local agencies for providing certain services that are special education and related services; (iii) resolve interagency disputes; and (iv) coordinate the provision of services that are also special education or related services to eligible students with disabilities in accordance with 20 USC §1412(a)(12).

VR is the agency responsible for implementing the Vocational Rehabilitation Program as authorized by the Workforce Innovation and Opportunity Act (WIOA) of 2014, which includes the Rehabilitation Act of 1973 as Title IV; and an individual, including a student, is eligible to receive Vocational Rehabilitation services (hereafter “VR services”), including transition services, if he or she is “an individual with a disability,” including eligible students under IDEA and Section 504 of the Rehabilitation Act, meaning that the individual has a physical or mental impairment that results in an impediment to employment and can benefit in terms of an employment outcome from VR services; and to be eligible, an individual also must require VR services in order to prepare for, secure, retain, or regain employment; and the Rehabilitation Act and its implementing regulations require Vocational Rehabilitation agencies to enter into formal interagency agreements with State Education Agency (SEA) describing how they will collaboratively plan and coordinate transition services for students with disabilities needing those services (Section 101(a)(11)(D) of the Rehabilitation Act and 34 CFR 361.22(b)).

NOW THEREFORE, the parties hereto agree:

III. GOALS

It is the overarching goal of this Agreement that, to the maximum extent possible, all eligible students with disabilities exit high school prepared to go directly into employment and/or post-secondary training programs, and independent living. In furtherance of this, VIDE/SOSE and VR shall work together to accomplish the following:
Implement practices in secondary school programs that include pre–employment transition services, that will prepare eligible students with disabilities for competitive and, where appropriate, supported employment; integrated recreation and leisure activities; college or postsecondary training, and personal management skills that allow for the greatest level of independence in social, recreational, residential and employment settings;

Ensure that all eligible students with disabilities and their parents/guardians are provided the necessary tools and resources to be actively engaged in planning their high school experiences and future post high school goals;

Coordinate activities among all involved segments of the community toward the purposes stated in this Agreement.

IV. Interagency Responsibilities

WHEREAS, both VIDE/SOSE and VR have obligations to serve the same population of eligible students with disabilities to ensure smooth transitions from school to post school activities, it is

THEREFORE, the parties intent in this Agreement to abide by the following provisions as the terms and conditions of their mutual understanding to ensure that eligible students with disabilities are college, career and community ready.

The parties (VIDE/SOSE and VR) to this Agreement shall:

Establish and maintain collaboration needed to achieve the purpose of this cooperative effort in providing for the successful transition of eligible students with disabilities from school to adult life;

Allow for the exchange of student information between VIDE/SOSE and VR as needed and within the parameters of students’ confidentiality rights;

Provide services to eligible students with disabilities in accordance with the mandated responsibilities, funding appropriations and available resources of the participating agencies;

Implement and disseminate this Agreement as well as other pertinent information Territory–wide;

Provide professional development and technical assistance activities for VIDE/SOSE and VR personnel, the LEAs, other public and private agencies, and parents/guardians/surrogates/students on topics related to transition planning and adult service activities;

V. VIDE/SOSE Responsibilities

1. Provide the general supervision of the IDEA in the Virgin Islands for special education and related services to ensure a free appropriate public education for students with disabilities;
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2. Serve as the lead agency in the development, revision and maintenance of cooperative efforts among the collaborating agencies to facilitate the successful transition of students with disabilities;

   a. Convene quarterly meetings, or as needed, to evaluate the transition process and recommend system changes.

3. Coordinate with VR for dissemination of information to local education agencies (LEAs) regarding effective, results-based practices for students with disabilities to be prepared for postsecondary education/training, employment and independent living;

4. Distribute the “VR Information Packet” for LEAs to provide to students referred to VR by age (16).

   The Information Packet will include:
   a) VR program and contact information; and
   b) VR brochures.

VI. VR Responsibilities

1. Provide the following five activities to eligible students with disabilities (16–21 year-olds): (i) job exploration counseling; (ii) work-based learning opportunities; (iii) counseling on post-secondary educational opportunities; (iv) workplace readiness training; and (v) instruction in self-advocacy;

2. Attend IEP meetings for eligible students with disabilities as appropriate and anticipate service needs;

3. Work with local workforce development boards, One-Stop centers, and employers to develop work opportunities for students with disabilities;

4. Develop guidelines and provide technical assistance on the implementation of this Agreement to LEA personnel, parents and students;

5. Notify relevant transition team participants of student eligibility determination and appeal process;

6. Develop an Individual Plan of Employment (IPE) with eligible students, before the student leaves the school setting;
Financial Responsibilities:

This Agreement was drafted prior to the release of final regulations of the Workforce Innovation Opportunity Act (WIOA) and will be revisited upon release of final regulations.

The final approved agreement is pending

B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs

The VI Department of Education, State Office of Special Education is responsible for the provision of special education and related services for students with disabilities, including transition services. The VIDOE is responsible for the development, coordination and implementation of the student’s IEP. Staff of the VI DOE and VIDDRS Transition Unit work collaboratively to facilitate interagency planning as well as collaboration with other agencies to assist in referring students to appropriate pre-employment transition services and develop strategies that support the career development pathways of students with disabilities leading to career and college readiness.

C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services

The Interagency Agreement outlines roles and responsibilities for both education staff and VR staff. VIDDRS staff is actively engaged in the implementation of the student’s IEP collaborating in the planning and referral development and facilitating identification of students with disabilities who may benefit from VR services as early as possible in the transition process. This ensures that transition services and goals on a student’s IPE are aligned. VR services should compliment services provided by schools but not replace those services.

D. Procedures for outreach to and identification of students with disabilities who need transition services

VIDDRS is engaged with the LEA to participate in IEP meetings. VIDDRS is also a member of the SEA/LEA Capacity Building team and we are working together to develop a territorial plan for transitioning students that will be inclusive of required Pre Employment Transitioning requirements. The plan will include action steps that each agency’s responsibility to promote the core principles for transition.

Transition planning for youth requires a multi-agency collaboration with early dialogue between the student with their families and other stakeholders (VR, DOE and DOL). This coordination will ensure consistent information and guidance about VR program and the availability of services between partner agencies.

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.

In keeping with the Workforce Innovation and Opportunity Act, the designated state unit will continue to strengthen agreements with Private Non-Profit Rehabilitation Agencies. This will allow individuals with significant disabilities to develop skills which result in an employment outcome. The Virgin Islands Association for Independent Living plays a vital role in teaching independent living skills to Vocational Rehabilitation Clients who are interested in the coordination of attendant care services, mobility training and integration in community affairs.

The Disability Rights Center/CAP of the Virgin Islands provides advocacy and referral services. This ensures accessibility to services and community resources. They also conduct workshops for parents of students with disabilities and education officials. They facilitate presentations on various disabling conditions; and information relation to transitioning. The VR staff has been invited to make presentations at these workshops also.

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.

The Virgin Islands has been faced with challenges in the provision of supported employment services for its VR clients. In 2010, the VI lost its two CRPs. Due to the uniqueness of the population, and the geographical isolation of the territory, traditional CRP models have not been most beneficial therefore VIDDRS is implementing a unique model that it believes will be successful. VIDDRS has recruited and trained six individuals who have interest and transferrable skills to be certified job coaches. Due to reasons beyond our control, three job coaches have since left the program.

As mandated by WIOA, VIDDRS is engaging in an initiative with the Virgin Islands Department of Labor (VIDOL) and Virgin Islands University Center for Excellence in Developmental Disabilities (VIUCEDD), to facilitate employment for individuals with significant disabilities. The intervention will serve as a pilot led by VIUCEDD and the results will be documented and used to improve employer engagement, outreach efforts and employment outcomes for the most significantly disabled individuals.

VIDDRS continues to collaborate with private non-profit service providers who are able to provide supported employment in limited fields. VIDDRS continues to work with clients to develop natural supports to include employers, family members and other local programs that serve our target population. The agency will continue to explore available options for funding the provision of extended supports. The VR Program continues to partner with the VI Department of Labor (VIDOL) to facilitate employment services for VR clients. VIDDRS is not present in now
present in the job center weekly. Through this partnership, VIDDRS to serve VR eligible individuals who are attempting to navigate the Virgin Islands Department of Labor.

VIDDRS collaborates with DOL to access on the job training and other job services available to support our clients. VIDDRS continues to concentrate its efforts on educating interested parties regarding the process of becoming a non-traditional provider source for supported employment services. A variety of supported employment provider choices are needed, particularly due to the lack of “factory-type” businesses in the territory. VIDDRS continues to focus on providing technical assistance and coordinating training for vendors of supported employment services to VIDDRS staff members, and staff members of other public and private agencies such as DOL and DOE.

VIDDRS has developed a relationship with VIUCEDD and we will continue to pursue evidence based practices to favorably impact supported employment outcomes. VR will provide supported employment services for individuals with the most significant disabilities, including youth, to achieve the employment outcome of supported employment in competitive integrated employment. This will be achieved through the expansion of our supported employment initiative to include the University Center for Excellence in Developmental Disabilities (VIUCEDD). Additionally, Independent job coaches will provide supported employment services for up to 24 months, with the option to increase as needed in special circumstances.

VIDDRS will continue to partner with the VI Department of Labor to ensure that a sound business engagement strategy is implemented to maximize opportunity for sustainable relationships and employment opportunities with businesses in the territory. VIDDRS will utilize existing partnerships and establish new partnerships in the private sector to facilitate these extended services.

The Virgin Islands Association for Independent Living is a partner that continues to provide independent living skills and mobility training to individuals with the most significant disabilities. In addition, the Designated State Unit and the Virgin Islands Association for Independent Living are developing projects and extending services to individuals who are older with visual impairments.

Funding for extended services is available from several sources based on the consumer's disability, eligibility and the available resources available, VIDDRS will provide extended services funding to those individuals who, after placement in employment have no other resources to provide the long-term supports. Accordingly, VIDDRS will utilize its funds to provide extended services in supported employment post-placement in employment.

VIDDRS and its WIOA core partners are in the process of developing a service delivery system that will enable state agencies to cost share the appropriate services needed for consumers to choose, find and maintain meaningful competitive supported employment. We believe that the implementation of this initiative will increase in the availability of resources for extended services. Currently, available funding is administered at local levels and each situation handled individually. Sources include: •Virgin Island Department of Labor - Employment and Training •VI Department of Education - LEAS •VI JOBS Program •Social Security Administration Work Incentives when applicable •Private Sector Natural Supports
g. Coordination with Employers

(Formally 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

VIDDRS is working in collaboration with the Department of Labor Employment and Training Division to implement a seamless system for employer engagement to facilitate career opportunities in the demand occupations in the territory which include Administrative and Support Services, Allied Health, Construction trades, Information Technology, Leisure and Hospitality, Retail and Transportation and Logistics.

2. Transition services, including pre-employment transition services, for students and youth with disabilities.

Development and Approval Process for IPE prior to students exiting school VIDDRS will provide technical assistance to counselors on strategies for timely determination of eligibility and development of IPEs for youth with disabilities to ensure that the IPE is developed before the student leaves high school.
o VIDDRS will hold regular (bi-weekly) case reviews to provide a forum for counselors to discuss and share strategies that have been successful in addressing challenges. VIDDRS will implement a plan for identifying cases at day 45 for which eligibility has not been determined as follows: Transitioning applicants will be identified and flagged upon receipt of referral;
o Cases that have been in applicant status for over 30 days will be reviewed and appropriate action taken Once eligibility has been determined;
o VIDDRS will monitor IPE development based on 90 days as stated in our policy manual Quarterly case reviews will be conducted within the last two weeks of December, March, June, September to determine compliance with requirements for timely determination of eligibility; and
o Development of IPE

The goal is for 100% of IPEs will be developed within 90 days of eligibility determination.

Coordinating with Education Officials The Virgin Islands Department of Education as the State Educational Agency (“SEA”), and through its State Office of Special Education (“SOSE”) and through its Local Educational Agencies (“LEAs”), is charged with the responsibility of ensuring that each eligible student with a disability is provided with a free appropriate public education in accordance with the Individuals with Disabilities Education Act (“IDEA”), 20 USC § 1400(d); and

The purpose of this agreement is to support the transition of eligible students with disabilities from secondary schools to integrated employment and adult roles, continuing and post–secondary education, adult services, independent living and community participation through improved cooperative and collaborative efforts among relevant service providers; and

The Virgin Islands Department of Education shall:
o Ensure that an interagency agreement or other mechanism for interagency coordination is in effect between each non–educational public agency and the DOE, as required by the IDEA, and its implementing regulation at 34 CFR § 300.2(a)and (b) [20 USC § 1412(a)(12)], in the provision of a free appropriate public education to eligible students with disabilities; and
o Coordinate with the Department of Human Services – VIDDRS for dissemination of information to local education agencies regarding effective, results–based practices for students with disabilities to be prepared for postsecondary education, vocational training, integrated employment including supported employment, continuing and adult education, adult services, independent living or community participation;
o Ensure that the collaborating parties to this Agreement meet quarterly or as needed to evaluate the transition process and recommend system changes;
o Coordinate with DHS to provide professional development and technical assistance activities for DOE staff, the LEAs, other public and private agencies, and parents/guardians/students/ surrogates on topics related to transition planning and adult service activities;
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- Provide training in conjunction with DHS regarding transition services and interagency service linkages; and
- Coordinate with DHS to distribute the “DHS Information Packet” for LEAs to provide to students referred to DHS by age (16). The Information Packet will include DHS program and contact information and DHS brochures.

DEPARTMENT OF HUMAN SERVICES (DHS) The Department of Human of Services, as a State Agency federally mandated to collaborate with the Special Education Division of the Department agrees to Designate at least one member from its respective divisions that may provide services to the eligible client as an IEP team participant for the purpose of attending conference meetings pertaining to the implementation of this Interagency Agreement, and for planning for transition planning and implementing the services required by the student’s IEP.

The DHS’s Division of Disabilities and Rehabilitation Services agrees to:

- Develop guidelines on the implementation of this agreement and train state and local-level staff regarding those guidelines;
- Provide vocational rehabilitation services to students who meet the eligibility criteria of DHS; Attend IEP meetings for eligible students beginning at age 14 and at a minimum by age 16, to identify and anticipate service needs;
- Provide consultation and technical assistance to aid LEAs in planning for the transition of eligible students as needed;
- Conduct educational/informational workshops to interested students, parents/advocates on the Vocational Rehabilitation Process and where referrals may be accepted;
- Develop an Individual Plan of Employment (IPE) with eligible clients, before the student leaves the school setting. Notify relevant transition team participants of student eligibility determination and appeal process;
- Provide exploratory opportunities in community–based businesses for students identified by Vocational Rehabilitation and DOE throughout the school year;

This agreement recognizes that each agency has its own administrative mechanisms for the timely resolution of internal disputes.

All signatory parties and their respective agencies are responsible for resolving their own internal disputes, so long as each agency acts in a timely manner and consistent with provisions set forth in that program’s regulations. Financial responsibility rests with VIDDRS for vocational rehabilitation services needed by transitioning youth with disabilities, ages 16 to 21, who have left school by way of graduation or who have otherwise exited the school system. VIDDRS will provide services that are legally their responsibility for those transitioning youth who are approaching or are of working age and who are determined to be eligible for services by VIDDRS. *VIDDRS and VIDE have completed the first draft of the amended agreement (the original document was signed in 2006). The final approved agreement is pending and will be approved by both parties before the start of the 2013–2014 school year.
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;

Both VIDDRS and the Medicaid program are under the same DSA, and a collaborative relationship exists as it relates to shared clients and referral of clients. Existing information including medical reports and other financial data is shared as necessary, additionally

2. The State agency responsible for providing services for individuals with developmental disabilities; and

VIDDRS works collaboratively with this entity to promote advocacy for VR consumers through partnering various initiatives to identify and address barriers to employment for people with developmental disabilities.

3. The State agency responsible for providing mental health services

The Virgin Islands is experiencing significant challenges with the level of services available to persons who are mentally ill. Due to a retirement of professional staff, we are experiencing challenges in services to clients. Currently, VR is utilizing private vendor to ensure that diagnostic services and treatment are provided for VR eligible individuals.

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;

Presently, the total number of the Designated State Unit staff is eighteen (18), full time equivalent (FTE). The Designated State Unit needs twenty-four (24) full time equivalence staff and has projected a need for one full time VR Counselor within the next five years.
The Designated State has one vacant counselor positions which became vacant due to relocation of the staff; this position has proven very hard to fill. Currently, the Designated State Unit’s active caseload is approximately 405 consumers whose needs are very diverse and complex.

In addition, they are markedly difficult and challenging. It is projected that within the next five (5) years the active caseload will increase to approximately 580 consumers with 480 being individuals with significant disabilities. Projections for the increase of consumers are based on all of the Designated State Unit vacant positions being filled, population increase in the territory, increase in Workers Compensation population, and the number of transitioning students within the next five years. It is also projected that the Designated State Unit will be able to serve the projected number of consumers with its current staff (assuming all vacancies are filled).

**ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and**

Vocational Rehabilitation Counselor (1 vacancy) Transition Supervisor (1 Vacancy)
Administrative Officer (1 vacancy)

**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.**

It is expected that the current VIDDRS staff (with existing vacancies filled) will be able to serve projected individuals that are eligible for VR services. Currently there are two managers who will be eligible for retirement. VIDDRS will work with our Human Resources office to ensure that succession planning in implemented.

**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**

There is currently one institution of higher education (University of the Virgin Islands) within the territory that offers certified undergraduate and graduate degree programs. These programs are in Psychology, Education, Nursing and Business Administration. Unfortunately, the university does not provide a degree program or courses in Vocational Rehabilitation Counseling. Staff interested in a graduate program must enroll in an institution on the U.S. mainland. Currently two VR counselors are pursuing master degrees programs at the University.

**ii. the number of students enrolled at each of those institutions, broken down by type of program; and**

**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.**
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.

Staff interested in entering the Council on Rehabilitation Education (CORE) approved Vocational Rehabilitation Counseling Programs must enroll in universities on the United States mainland or study via distance learning. The Designated State Unit (DSU) strongly encourages staff entering the unit to meet the CSPD standards, however this is not required. VIDDRS supports individualized educational pursuit with an expectation that the standards will be met within 3 to 4 years. Staff who are not certified are encouraged to meet the standards. In addition, the DSU is discussing incentives to encourage staff to meet this standard. The proposed incentive is to provide a $2,000 increase for counselors that obtain their masters degree and an additional $2,000 increase upon achievement of CRC certification. Recruitment of staff is conducted through the government personnel system; persons trained in the field of Vocational Rehabilitation counseling or persons with similar backgrounds in social work, education or psychology are qualified to be hired as VR counselors.

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

Traditionally, the Designated State Unit has adhered to standards set by the State Civil Service System which are consistent with the highest entry–level academic degree of a B.A. in Vocational Rehabilitation Counseling or a related field, needed for professions in this category.

As there are no State approved or recognized certification, licensing or registration requirements for rehabilitation counselors; the Designated State Unit has based its personnel standards for counselors on those needed to meet the national Certified Rehabilitation Counselor (CRC) requirement which is a master’s degree in rehabilitation counseling or a related field or other master’s degree that meets the CRC specifications. Deadlines and a written plan for personnel to meet the CRC requirements have been established. The Designated State Unit is communicating with the Office of Personnel and Labor Relations to approve a plan that will address this issue,
however, the plan has to be negotiated and agreed with the counselors’ collective bargaining unit.

The Head of the designated State Agency is very supportive of the State Unit’s recruitment efforts. Job specifications for Rehabilitation Counselors were revised to reflect a graduate degree as the minimum entry-level requirement. This revision has increased the entry-level salary and hopefully increases the pool of interested candidates.

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.

VIDDRS will work collaboratively with VIUCEDD, LEA, and other training providers to ensure that VR personnel is equipped with the tools required to address the complex challenges that confront VR consumers may face utilizing evidence based research and other available data.

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

The Designated State Unit annually identifies personnel need for educational upgrading. This year analysis of personnel educational need reveals that five (5) counselors are in need of further education to comply with the Designated State Unit requirement for highly qualified personnel. One (1) counselor has completed the graduate program at the State University of New York at Buffalo via distance learning. The employees that remain in need of training are encouraged to participate in an accredited VR graduate degree program.

The Designated State Unit continues to work with the Office of Personnel and Labor Relations to implement an approved individualized training plan for the counselors’ professional development which has the support/approval of the counselor’s collective bargaining unit. The fundamental guidelines for this plan include individualized educational pursuit with anticipation that they will meet the CSPD standard for a qualified VR counselor in 3 to 4 years. Progress of these individuals with respect to meeting the applicable standard will be reviewed annually.
Therefore, the Designated State Unit is committed in assisting present counseling staff with bachelor degrees to meet the new entry–level requirement of a graduate degree in Rehabilitation Counseling. Those interested persons can enroll in the local university with the understanding that they will also have to complete their studies at a CORE approved Rehabilitation Counseling program at a mainland university or via distance learning. Staff on all levels employed by the Designated State Unit, as well as, staff from supporting agencies, such as Independent Living, Special Education, Mental Health and the Department of Labor Employment Training Unit is invited to participate in all in–service training workshops.

Training is provided for staff on all levels through local programs, the State University of New York at Buffalo, Technical Assistance Continuing Education (TACE) Center and by other related programs sponsored by various agencies. Training may be in areas such as Assistive Technology, the Rehabilitation Act Amendments, Computer Literacy, Workforce Development, Individual Disabilities, Method of Supervision, Supported Employment or Ticket–To–Work. Through this mode; staff is able to keep abreast of all emerging trends and changes in the program, as well as, the development of self–growth. All staff is given an annual evaluation of their job performance in accordance with the territory’s personnel policies and procedures. Training needs assessments are conducted among the staff, which assists VIDDRS in planning and training providers.

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

VIDDRS will provide access to VR personnel and stakeholders to facilitate a more trained team with enhanced 21st century knowledge on the issues confronting persons with disabilities and strategies that have be effective in other jurisdictions.

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.

In addressing issues associated with diversity and cultural needs, the Designated State Unit employs one bilingual individual. The territory has a large Hispanic population mainly due to its close proximity to Puerto Rico and the surrounding Hispanic islands. Furthermore, the Designated State Unit is committed to securing the cost for interpreter services for any other languages. The DSU also makes available, devices to help improve communication for visually impaired consumers. Lastly, the Designated State Agency has a list of interpreters for the deaf available on an as needed basis.

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.

Attempting to maximize available resources and to increase networking opportunities, the Designated State Unit plans to continue cross-training activities that would benefit all professionals involved. The Designated State Unit is actively collaborating with the State Office of Special Education in its capacity building initiatives. Counselors are involved in enhancing transitioning activities within the schools and attend training events sponsored by the schools.

Counselors and support staff participate in students IEP development and provide services for students to enhance transitioning from school to work. Staff from related programs is encouraged to enroll in our training programs. Training efforts are geared to ensure the development of qualified staff for succession planning and leadership skills. The Designated State Unit utilizes all opportunities to involve all managers in the Unit’s overall functions. They are encouraged to attend management training programs offered by the Department, as well as, those offered in the territory and off island specifically for the Vocational Rehabilitation program. In the event of the resignation or retirement of any staff member, remaining on–board staff will be knowledgeable enough to keep the program running until replacements are hired in accordance with the Designated State Agency’s policies. The Designated State Unit continues to search for new and effective practices to attract qualified personnel to work in the territory. Recruitment and retention of qualified vocational rehabilitation counselors continues to be the biggest challenge and liability.

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;

Introduction This needs assessment was jointly developed under the direction of the Department of Human Services, Division of Disabilities & Rehabilitation Services, the Virgin Islands State Rehabilitation Council, and the Virgin Islands State Independent Living Council. The first two entities are recognized by Rehabilitation Services Administration (RSA), United States Department of Education, as the territory’s vocational rehabilitation agency and council under the federal Rehabilitation Act of 1973, as amended. The Rehabilitation Act requires each state’s vocational rehabilitation agency and state rehabilitation council to periodically develop a comprehensive statewide needs assessment.

The purpose of the needs assessment is to inform the agency and the council as they develop a new three-year strategic state plan. The assessment is designed to answer important questions about the population of eligible for VR services that live in the Virgin Islands and their vocational rehabilitation needs. It serves to inform DVR’s strategic plan and goal development for the next three fiscal years, 2016 - 2020.
In its compilation, we rely on a variety of publicly available sources, including survey information from the United States Census Bureau and data from the Rehabilitation Services Administration. We gathered information from the Virgin Islands Departments of Labor, Education, and Health and Human Services, as well as numerous stakeholder groups, including people with disabilities, employers, and Vocational Rehabilitation Counselors.

The VIDDRS’s needs assessment was designed to respond to federal regulatory requirement and to provide information for the development of the territory’s plan for vocational rehabilitation around three broad areas of investigation:

1. Assess the impact and the nature and scope of services currently provided by VIDDRS;

2. Identify rehabilitation needs of persons with disabilities in the Virgin Islands and specifically the rehabilitation needs of the un-served and underserved Virgin Islanders; and

3. Identify areas for expansion or improvement of services. To address these issues the Agency reviewed data from a variety of sources including information available from the United States Census Bureau, the Rehabilitation Services Administration, Virgin Islands Department of Education and the Virgin Islands Workforce Investment Board.

Updated information was collected through a customer survey, and forums held throughout the territory.

Within this report the reader will find:

• Review of population statistics
• Review of VIDDRS service data
• Review of survey data to assess customer satisfaction
• Review of performance data to assess the provision of transition services and the needs of transition aged customers
• Review of the information received at forums held at strategic locations throughout the Territory

In accordance with federal regulations 34 CFR § 361.29, the focus of the data collection for the CSNA was on:

1. What are the rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation services needs of individuals with most significant disabilities, including their need for supported employment services?

2. What are the vocational rehabilitation services needs of individuals with disabilities who are minorities or in un-served or underserved populations?

3. What are the vocational rehabilitation service needs of individuals with disabilities who are served through other components of the statewide workforce investment system?
4. What is the need to establish, develop, or improve Community Rehabilitation Programs (CRPs) within the territory?

Multiple data sources were used to inform the CSNA
- Consumer Satisfaction Survey
- Community Survey of the General Population
- VIDDRS VR Counselors Focus Group
- Stakeholders Focus Groups
- US Census Data
- USVI DOE Annual Performance Report FFY 2011
- RSA Statistical Data - Fiscal Years 2007 -2012
- USVI State Integrated Five Year Workforce Plan 2012-2017
- Public Forum A survey was conducted among 2984 persons.

Instruments were circulated to all government employees via their pay stubs, to the private sector via outreach activities coordinated by the SRC. Collection boxes were placed strategically in the community as well as telephone contact was made to coordinate pick-up from the more rural areas. VIDDRS was pleased with the enthusiasm and support from staff, stakeholders and the general public.

Data contained herein will be utilized as baseline data for future CSNAs Secondary Research Census Data Statistics.

The US Virgin Islands has a population of is 105,433 people; 78% black, 10% white and 12% other. While 81% of the population is of West Indian background only 49% were born in the Virgin Islands. The remaining 32% were born elsewhere in the Caribbean. Residents originally from the US Mainland make up 13% of the population and Puerto Ricans make up 4%. The remaining 2% is a mixture of immigrants from across the world including the middle-east, India and Asia (Source: US Census Bureau - 2000).

Data from the 2010 USVI Census indicates that there are 615 individuals a disability below the age of 18. The Virgin Islands Department of Education Annual Performance Report for FY 2011 indicated that in FY’ 2011, 46 of 152 (30.26%) students in the 4 year cohort group earned a regular diploma; which allowed the Virgin Islands Department of Education, State Office of Special Education (VIDE/SOSE) to meet their targeted goal of 24%.

The four-year adjusted cohort graduation rate is required by the Elementary and Secondary Education Act, is used to determine the graduation rate for students with disabilities. The percentage is identified by the number of students with disabilities in the cohort who earned a regular high school diploma through the summer of 2011 and divided by the number of first time 9th graders with disabilities who enter by the beginning of the first marking period each semester plus students who transfer in, minus students who transfer out during four prior school years.
The requirements for all students, including students with disabilities, to graduate with a high school diploma are as follows: students must earn a minimum of 26 Carnegie units from grades 9-12.

Twenty-one of these Carnegie units must be in specific required courses and the other five in electives. According to VIDE/SOSE FY’ 2011 data, 61 of 1139 (5.35%) students with IEPs did not complete high school. “Dropout” is defined, in the Virgin Islands, as a student with a disability who is enrolled at the beginning of the school year and not enrolled at the conclusion of the school year. This definition applies to all students; however, the data that is presented is from grades 7 through 12. The VIDDRS Vocational Rehabilitation Counselors participated in 2012 Summer Institute. Their participation was a result of an active effort by both VIDDRS and DOE to engage in collaborative activities for the benefit of students with disabilities. This activity enhanced the relation with the staff of both program and it facilitated the development of more effective transition plans for students and ultimately, to positively influence student success in achievement of post-secondary outcomes. VIDE/SOSE maintain data on Special Education students one year beyond secondary education to track students’ career paths. The VIDE/SOSE had 6 out of 91 respondents (6.59%) report that they were “enrolled in higher education” within one year of leaving high school; 40 out of 91 respondents (43.96%) reported that they were “engaged in competitive employment”; and 19 out of 91 respondents (20.88%) reported that they were in “some other postsecondary education or training”. 26 out of 91 respondents (28.57) report that they were “not engaged”. The response rate for this survey was 73.39%.

Workforce Investment Board (WIB) The Virgin Islands is a Single Local Workforce Area and has one State Workforce Investment Board that also assumes the duties of the Local Board. The Virgin Islands Department of Labor is the designated State Workforce Agency. There are two workforce centers in the Virgin Islands - one in the St. Thomas/St. John district and one in the district of St. Croix. The agencies that comprise the public workforce investment system include the Departments of Labor, Education, Human Services and Justice.

The Workforce Investment Board and the Economic Development Authority comprise the advisory and policy development segment of the Workforce system. The VIWIB is currently coordinating a partnership effort that places additional focus on three vulnerable priority groups who though served can be served more effectively to maximize employment potential. Those groups are the disabled population, veterans and out of school youth. As employment opportunities shrink and become more competitive, disabled workers are forced to acquire even more skills and competencies to become employable.

Support services become essential and finding the best fit for their skills often provides a challenge for workforce staff as well as employers. The same is true for those youth who are out of school and displaced. Many find themselves unable to articulate the support they may need to achieve their goals. Watching friends and peers succeed while they do not, only adds to the stress of completing education and training goals. By developing the Careers Pathway model, specific to each group, the VIWIB hopes to help each attain the skills needed to enter and advance in the workforce. Instead of waiting for qualified workers, they can assist is creating qualified workers through on-the-job training and registered apprenticeships for new or unskilled workers and by refreshing their existing workforce through incumbent and customized training. Employers now have the option to choose the most qualified individuals from a large pool of unemployed workers.
Unskilled and/or inexperienced Adults and Youth are now in direct competition with skilled and qualified dislocated workers for the same jobs; and many of the existing jobs may not be compatible with the skill set of the dislocated workers.

The success of any workforce investment initiative is contingent on the active participation of employers. This was the sentiment expressed by stakeholders and partners of the WIB.

*Mental Health Services* The Department of Health is the legal authority set forth in Virgin Islands Code; it functions as both the state regulatory agency and the territorial public health agency for the U.S. Virgin Islands. The Department of Health is responsible for the regulation of health care providers and facilities, policy development and planning, as well as vital, conducting programs of health promotion, protection and preventive medicine. The Division of Mental Health, Alcoholism and Drug Dependency Services (DMHADDS) is an entity within the Department of Health charged with establishing and administering programs designed to offer prevention and treatment intervention in the areas of substance abuse prevention, substance abuse treatment, mental health and residential services.

Issues and Challenges Impacting the Mental Health and Substance Abuse System of Care in the USVI are:

- No reliable data on the incidence of mental illness in the community;
- Major problems in delivery, coordination and integration of services;
- Lack of services for children with mental disorders;
- Increase in demand for counseling and case management services, especially among women and children DMHADDS is encouraging residents to do their part to help de-stigmatize the issue of mental health illness and to help raise the awareness of mental health wellness. Source: 3rd Annual Health Disparities Institute; St. Thomas, USVI October 21-22, 2010 Primary Research Program Staff Focus Group.

The VI SRC conducted focus groups with VIDDRS staff in an effort to obtain their opinion on the following:

- What are the rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation services needs of individuals with most significant disabilities, including their need for supported employment services?
- What are the vocational rehabilitation services needs of individuals with disabilities who are minorities or in un-served or underserved populations?
- What are the vocational rehabilitation services needs of individuals with disabilities who are served through other components of the statewide workforce investment system?
- What is the need to establish, develop, or improve community rehabilitation programs (CRPs) within the state? Staff indicated specific disability and demographic groups that are underserved or un-served: transitioning youths, US Virgin Islands minority populations, homeless
individuals, individuals with moderate to severe cognitive impairments, physical disabilities and mental illness, and migrants with language barriers.

Overwhelmingly, respondents indicated that they felt that the disability group that are most underserved are persons with mental illness. They felt that appropriate service infrastructures are not in place; therefore they are unable to manage or cope with their disabilities. In most cases, the consumers are not job ready and unable maintain employment for a significant time period. This may be due to the lack of psychiatric treatment to facilitate mental stability. Persons with challenges which often lead to homelessness was another group that staff felt that was underserved; this group is largely comprised of individuals who are mentally ill.

Responders indicated that these individuals had no contact information and were mostly unreachable. This prohibited or caused a significant delay in services. Most times, these consumers were unstable and have mental illnesses. Many are closed before employment outcome; or, they fluctuate between jobs.

The Virgin Islands minority population was also indicated as a population that is underserved and un-served. Minorities in the Virgin Islands mainly consist of Asians, Caucasians, and Hispanics. Staff felt that the reason why minorities are underserved is due to attitudinal barriers within the community that deter the interest in seeking services.

Due to the close proximity of the surrounding Hispanic islands, the territory has a large Hispanic population. Spanish is their primary language and many have difficulty accessing resources in the territory. These individuals have a difficult time finding written information in Spanish, and they often experience challenges in verbal communication; especially during job a search. Transitioning youths were considered underserved or un-served due to several concerns. The lack of community rehabilitation programs (CRPs) continues to be a significant concern in providing supported employment services to transitioning youths.

VIDDRS has implemented a transition unit that provides some assistance to youths, however, there remains a significant gap in services when these individuals require the services of a job coach. These transitioning youth are mostly individuals with moderate to severe cognitive disabilities and mental illnesses. Some counselors also expressed that transitioning youths are unfamiliar with VR services; therefore does not follow through with services. It was discussed that more outreach should be considered on different platforms to ensure that transitioning youths and their families have frequent opportunities to be fully aware of services; this may favorably influence the amount of closures before employment outcomes. 504 youths were another population that was considered underserved due the amount of referrals. Counselors stated that referrals are only received when teachers or guidance counselors attempt to find resources for particular students.

VR Counselors are not regularly invited to 504 meetings and VIDDRS does not provide outreach specifically to this population. Due to the size and geographical uniqueness’s to the territory, individuals with physical disabilities encounter many challenges which prevent full participation in the community. Many buildings in urban areas are historic buildings and are not accessible and modifications are not always possible. Many are not equipped with regulatory accessible bathrooms.
Additionally, in certain areas, even with the appropriate allotted parking spaces, parking is limited and sometimes challenging to access. In all, staff felt that continued collaboration with the program’s stakeholders through outreach within the territory will increase services to the unserved and underserved populations, increase minority participation, and identify unmet service needs. They indicated that having an electronic case management system would increase the efficiency of program and services. All agreed that developing new CRPs or a pool of certified job coaches will increase services and employment outcomes. Consumer Satisfaction Survey Vocational Rehabilitation Services identified 133 former consumers whose cases were closed in fiscal year 2011 at various statuses throughout the Vocational Rehabilitation process. During August 2012, the State Rehabilitation Council conducted telephone interviews with 46 former consumers.

Assurances were made to consumers that their comments would remain anonymous and be precise to the extent possible. The interview questions can be found in the appendix. Varying reasons were identified for non-participation in the survey. Many consumers’ telephones were disconnected during the survey period. Others never responded to multiple requests left on their answering machines. Several relocated to the Continental United States and a few denied receiving Vocational Rehabilitation services. The result of the survey revealed that more than majority of the consumers felt that Vocational Rehabilitation services were satisfactory or better. A small percentage was neutral throughout the survey. However, there were a significant percentage of consumers that felt the VR services need improvement, especially in continuous communication with consumers.

Some of the generalized comments that were expressed during the survey were:

- The need for more job search and job placement assistance,
- Insufficient communication and follow-up during service delivery,
- Insufficient customer service assistance from VR staff,
- Need for more collaboration between Special Education and VR services, and
- VR needs to help increase consumer self-advocacy. Transition Services RSA’s 2012 monitoring of VIDDRS data analysis of the program’s performance outcomes indicates, VIDDRS is bringing more youth with disabilities into the VR program, but an increasing number of them are leaving before receiving services, and therefore not achieving their vocational goal.

In addition to an analysis of the performance outcomes for youth with disabilities, RSA interviewed field level staff to better understand the challenges that they face. According to the Virgin Islands Division of Special Education Parent Satisfaction survey dated June 2013, parents responded that, the least satisfying item was that the transition outcomes were developed for the child with his/her input.

The second least satisfying item was that the parent was satisfied with the transition services provided to their child that will help prepare him/her for movement from school life to adult life. In response to these measures, VIDDRS the LEA and SEA have become more engaged to ensure that VIDDRS is involved in IEPs and outreach activities coordinated by the LEA and SEA.
Additionally, VIDDRS and the LEA are discussing how as partners we can be more engaged. VIDDRS, and VIDOL are working closely with the LEAS to facilitate job readiness training that will result in competitive employment opportunities in demand fields in the community. A comprehensive plan will be implemented for the 2017-18 school year.

B. Who are minorities;

Specific disability and demographic groups that are underserved or un-served: transitioning youths, US Virgin Islands minority populations, homeless individuals, individuals with moderate to severe cognitive impairments, physical disabilities and mental illness, and migrants with language barriers.

C. Who have been un-served or underserved by the VR program;

The Virgin Islands has experienced significant challenges in serving individuals diagnosed with mental illness as well as individuals with significant intellectual disabilities. In an effort to address these challenges, VR is engaged with the Department of Health address the barriers that the mentally ill face in maintaining stability. The Workforce system is job driven and focuses on developing talent with specific employment outcomes in local demand sectors as a goal. VR counselors will provide counseling and guidance to assist clients in identifying career opportunities that matches their skills and abilities.

D. Who have been served through other components of the statewide workforce development system;

The VI Workforce System operates on the premise that everyone who accesses the system is seeking employment – either a first time job or an advanced work opportunity. VR counselors have regular presence in the VI Job Centers and as such all workforce services which are beneficial to VR consumers are utilized such job readiness workshops and seminars, individualized career counseling, and job search, matching and referrals.

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 youth with disabilities with the most significant challenges are students with intellectual disabilities. There is a need for more coordination with the LEA to coordinate job readiness training and engagement of the workforce system to facilitate on the job training opportunities that have the potential of career opportunities for this population.

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State;

The need for functional community rehabilitation programs remains critical. VR continues to work with the University of the Virgin Islands Center for Excellence in Developmental
Disabilities (VIUCEDD) and other stakeholders and partners, to develop an innovative model for recruitment, and training of job coaches that can meet client’s diverse needs. VIDDRS management provides ongoing evaluation of the proficiencies of the job coaches. Technical assistance and training will be provided as needed.

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.

**k. Annual Estimates**

*(Formerly known as Attachment 4.11(b)) Describe:*

1. The number of individuals in the State who are eligible for services;

   The need for Supported Employment services remains critical. It is projected that the agency will be able to provide supported employment services to all eligible individuals in fiscal year 2016. VIDDRS continues to work diligently to enhance and improve supported employment services through this innovative approach. Technical assistance and training will be provided as needed. The supported employment grant remains at approximately $36,403.00. VIDDRS will utilize Title I funds for provision of services that exceed Title VI funds. The VI comprehensive statewide needs assessment, identified significant gaps in services and available resources to facilitate employment outcomes for the most significantly disabled individuals. • Lack of specialized transportation • Need of more public awareness about services available for persons with disabilities • Need for more outreach to employers in both the public and private sectors • Development of quality assurance and evaluation system to improve the overall operation of VIDDRS.

   VIDDRS will continue to recruit, train and work closely with the job coaches to address areas that require additional technical assistance to ensure sustainability of Supported Employment Independent Providers. Based on the current VR caseload, and existing VR counselor vacancy it is estimated that the VIDDRS will be able to serve 490 persons. Within twelve months, once the program is automated and data is integrated within partners of the workforce system it is estimated that the VR program will significantly increase the number of clients served.

2. The number of eligible individuals who will receive services under:

   **A. The VR Program;**

   Title I Estimated Funds: 1,703,863

   Estimated Number to be Served: 490

   Average Cost of Services 3,477.00 Persons with the most significant disabilities 310 Persons with significant disabilities 160 Persons with less significant disabilities 20
Title IV Average Cost of Services: 2,296 Estimated Funds: 34,435.00 Persons with the most significant disabilities 15

B. The Supported Employment Program; and

The Designated State agency receives an annual award of $34,435 for the provision of Supported Employment Services under Title VI – C part B. Due to challenges with the availability of functional CRPs, VIDDRS have been unable to provide adequate Supported Employment Services to meet the needs of the significantly disabled population. The transitioning program has played a significant role in augmenting our supported employment needs while we continue to work on implementing functional CRPs. This remains a high priority area for the 2017 Fiscal Year.

C. each priority category, if under an order of selection;

N/A

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

N/A

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.

N/A
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I. 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 following describes the VIDDRS goals and priorities in collaboration with and agreed to by the State Rehabilitation Council. For the development of agency goals and priorities; VIDDRS and the VI SRC utilized the most recent comprehensive statewide needs assessment, agency data, from RSA’s 2013 monitoring reporting and input from a variety of stakeholders.

1. VIDDRS consumers with significant disabilities can definitely benefit from the supports provided via a supported employment program. VIDDRS will provide enhanced supported employment services to facilitate employment and job training/internship opportunities for transitioning students and clients through development of relationships with the workforce system.

2. There is a need for increased visibility of the programs and services offered by VIDDRS. VIDDRS will collaborate with its SRC, stakeholders and other organizations to provide information that will make it possible for persons with disabilities to learn about the resources available at the Vocational Rehabilitation Program.

VIDDRS is very engaged in the Virgin Islands’ Workforce System and we will be collaborating on marketing initiatives with our partners to inform, educate and promote the services that the VR Program provides for Virgin Islanders with disabilities. We are currently in discussions about how the Virgin Islands Workforce System will be branded to benefit all partners. Additionally, VIDDRS will continue to engage new partners.

3. Increase outreach to the underserved and underserved individuals with disabilities; individuals who are minorities or individuals with the most significant disabilities. VIDDRS will provide brochures to public agency waiting rooms such as MCH, TANF, WIC, and the Emergency at our health facilities. We will continue to utilize local venues such as radio television and printed media to share information about the VR Program

• Results of our CSNA indicate that persons with disabilities are not integrated into the “fiber” of the community to the extent possible.

• The lack of knowledge and interaction with individuals with significant disabilities presents a definite barrier to vocational rehabilitation services thus to possible un–employment

4. Enhance collaboration with stakeholders to update existing Memorandums of Understanding;

5. Provide training on effective and innovative practices to improve employment outcomes for persons with disabilities. Specific emphasis will be placed on transitioning students and under/un–served youths; to enhance successful employment outcomes for these clients
6. Increase the number of individuals with significant disabilities applying for Vocational Rehabilitation services by:

• Holding informational forums jointly with the State Rehabilitation Council describing the vocational rehabilitation process for parent groups, education officials, families and other service providers of persons with disabilities.

• Marketing of the VR program through various media to inform and educate the general public about services provided by the VR program.

2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

3. Ensure that the goals and priorities are based on an analysis of the following areas:

A. The most recent comprehensive statewide assessment, including any updates;

B. the State’s performance under the performance accountability measures of section 116 of WIOA; and

Summary of VIDDRS Performance on Standards and Indicators

1.1 The number of individuals exiting the Vocational Rehabilitation Program who achieved an employment outcome during the current performance period compared to the number of individuals who exit the VR program after achieving an employment outcome during the previous performance period. –20 F Required Performance Level: Performance in current period must equal or exceed performance in previous period.

49–37 = 12 (12 more individuals)

1.2 Of all the individuals who exit the VR program after receiving services, the percentage that are determined to have achieved an employment outcome is 56.1 P Required Performance Level: 55.8

49/73 x 100 = 67.2%

1.3 Of all the individuals determined to have achieved an employment outcome, the percentage who exits the VR program in competitive, Self or Business Enterprise Program (BEP) employment with earnings equivalent to at least the minimum wage. 86.5 P Required Performance Level: 72.6 43/49 x 100 = 87.8%

1.4 Of all the individuals who exit the VR program in Competitive, Self or Business Program (BEP) employment with earnings equivalent to at least the minimum wage, the percentage who are individuals with significant disabilities. 100 P Required Performance Level: 62.4 43/43 x 100 = 100%

1.5 The average hourly earnings of all individuals who exit the VR program in Competitive, Self or Business Program (BEP) employment with earnings equivalent to at least the minimum wage as a ratio to the State’s average hourly earnings for all individuals in the State who are employed
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(as derived from the Bureau of Labor Statistics report "State Average Annual Pay" for the most recent available year.) 70P Required Performance Level: 52 (VI Ave. hourly Pay: $16.81 VR 26 closures Ave hourly: $13.78) 13.78/16.81 (82%)

1.6 Of all the individuals who exit the VR program in Competitive, Self or Business Enterprise Program (BEP) employment with earnings equivalent to at least the minimum wage, the difference between the percentage who report their own income as the largest single source of economic support at the time they exit the VR program and the percentage who report their own income as the largest single source of support at the time they apply for VR services. 47.4 F Required Performance Level: arithmetic difference of 53.0 Standard

(40/43 – 21/43) x 100 = 93 – 48.8 = 44.2%

2.1 The service rate for individuals with disabilities from minority backgrounds as a ratio to the service rate for all individuals with disabilities from non–minority backgrounds. 96 P Required Performance Level: 80

Minorities 67/95 =.71, Non–minorities 6/7 = .86, .71/.86 (82.6%)

C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and finding and recommendations from monitoring activities conducted under section 107.

VIDDRS has addressed the findings from RSA’s 2013 Monitoring. The VIDDRS continues to work with our fiscal office and third party fiduciary to update policies and procedures as required to enhance timely service delivery to clients and vendors. Within the last three years several longstanding membership vacancies on the VISRC have been filled, the council continues to recruit additional individuals for members whose terms have since expired. The new members are receiving ongoing training to better support and advocate for the VR program and its clients.

VIDDRS is very interactive and transparent as it relates to the sharing information about operation and programmatic challenges with the SRC that affect the effectiveness of the VR Program. With the implementation of WIOA the SRC leadership has been at the table during meetings with core partners and has provided input that it believes will help the VIDDRS with WIOA mandates. Specifically as it relates to: • Outreach and marketing to impact access to VR services for the unserved and underserved. • Improving transition services for students and youth with disabilities • Implementation of an electronic client case management system • Development of the Business Engagement Plan.

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.

N/A VIDDRS will not implement an order of selection.
B. The justification for the order.

N/A

C. The service and outcome goals.

N/A

D. The time within which these goals may be achieved for individuals in each priority category within the order.

N/A

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities;

N/A

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.

N/A

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 VI comprehensive state wide needs assessment, identified significant gaps in services and available resources to facilitate employment outcomes for the most significantly disabled individuals. • Lack of specialized transportation • Need of more public awareness about services available for persons with disabilities • Need for more outreach to employers in both the public and private sectors • Development of quality assurance and evaluation system to improve the overall operation of VIDDRS.

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

The purpose of VIDDRS Supported Employment Program is to assist individuals with the most significant disabilities to, including youth with the most significant disabilities, to achieve supported employment outcomes in competitive, integrated employment by developing and
implementing collaborative programs with entities that can provide some extended supports. The populations that we will focus on initially are:

Students in special education programs transition to community employment and individuals with severe and persistent mental illness who have traditionally been unsuccessful in obtaining 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.

VIDDRS will work collaborative with the Business Engagement team to facilitate an audience with employers in the private sector. The plan to develop the local talent pool will implemented to target various sectors in the workforce.

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.

Resources in the Virgin Islands are limited in relation to availability in other jurisdictions across the United States; this is due mainly to our geographical location from the continental United States. The current economic crisis has decreased the availability of jobs overall. This has created a challenge for persons with disabilities and the Vocational Rehabilitation Program. Of the territory’s caseload of 405 clients, approximately 3% are clients who receive supported employment services.

VIDDRS, in collaboration with the partners of the workforce system, 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) Workforce development activities revolve around the build out of Industry sectors. The Territory’s current demand sectors based on current hiring trends are: Administrative and Support Services, Allied Health, Construction Trades and Information Technology. VR counselors will receive training to better assist clients to develop employment plans that will enable them to be employed in areas that provide opportunities to earn a living wage and in demand sector industries that afford them opportunities for professional growth and career development.

The VR Transition Units (one each on St. Thomas and St. Croix) provide coordinated activities for transitioning students to assist them in preparing for jobs in integrated work settings. Transition Unit staff will assist with the implementation goals of the IPE as developed by the student’s VR Counselor. VIDDERS will engage in collaborative initiatives to facilitate provision of pre–employment services as required.
Students leaving for college will be provided with those assistive or technological devices necessary for their successful achievement of their post–secondary educational goals. Similarly, those clients entering the workforce will be assisted with the provision of assistive technology services to improve their performance in the workplace.

The State Agency will also partner with the Department of Education to hold joint training sessions for parents of students in the Special Education Program and plan educational and informational meetings with teachers, counselors and coordinators of the education Department. VIDDRS will provide information about the Vocational Rehabilitation program.

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.

VIDDRS will work collaborative with VIUCEDD to facilitate opportunities for VR consumers to have access to AT services and VIDDRS recognizes the importance of the full utilization of AT services and devices to assist eligible individuals with disabilities to achieve their full potential. VIDDRS will continue to explore partnership opportunities with other vendors as required to facilitate achievement of client goals.

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.

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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).

The VR Transition Units (one each on St. Thomas and St. Croix) provide coordinated activities for transitioning students to assist them in preparing for jobs in integrated work settings. Transition Unit staff will assist with the implementation goals of the IPE as developed by the
student’s VR Counselor. VIDDRS will engage in collaborative initiatives to facilitate provision of pre–employment services as required.

Students leaving for college will be provided with those assistive or technological devices necessary for their successful achievement of their post–secondary educational goals. Similarly, those clients entering the workforce will be assisted with the provision of assistive technology services to improve their performance in the workplace.

The State Agency will partner with the Department of Education to hold joint training sessions for parents of students in the Special Education Program and plan educational and informational meetings with teachers, counselors and coordinators of the education Department. VIDDRS will provide information about the Vocational Rehabilitation program.

5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

The Virgin Islands has been faced with challenges in the provision of supported employment services for its VR clients. In 2010, the VI lost its two CRPs. Due to the uniqueness of the population, and the geographical isolation of the territory, traditional CRP models have not been most beneficial therefore VIDDRS is implementing a unique model that it believes will be successful. VIDDRS has recruited and trained six individuals who have interest and transferrable skills to be certified job coaches. Due to reasons beyond our control, three job coaches have since left the program.

As mandated by WIOA, VIDDRS is engaging in an initiative with the Virgin Islands Department of Labor (VIDOL) and Virgin Islands University Center for Excellence in Developmental Disabilities (VIUCEDD), to facilitate employment for individuals with significant disabilities. The intervention will serve as a pilot led by VIUCEDD and the results will be documented and used to improve employer engagement, outreach efforts and employment outcomes for the most significantly disabled individuals.

VIDDRS continues to collaborate with private non-profit service providers who are able to provide supported employment in limited fields. VIDDRS continues to work with clients to develop natural supports to include employers, family members and other local programs that serve our target population. The agency will continue to explore available options for funding the provision of extended supports. The VR Program continues to partner with the VI Department of Labor (VIDOL) to facilitate employment services for VR clients. VIDDRS is not present in now present in the job center weekly. Through this partnership, VIDDRS to serve VR eligible individuals who are attempting to navigate the Virgin Islands Department of Labor. VIDDRS collaborates with DOL to access on the job training and other job services available to support our clients. VIDDRS continues to concentrate its efforts on educating interested parties regarding the process of becoming a non-traditional provider source for supported employment services. A variety of supported employment provider choices are needed, particularly due to the lack of “factory-type” businesses in the territory. VIDDRS continues to focus on providing technical assistance and training for independent job coaches in order to build capacity for the provision of supported employment services. VIDDRS, VIDOL and VIDOE have established relationships
with VIUCEDD and other providers utilizing evidence based practices to impact the establishment of viable CRPs in the territory.

6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

The partner’s workgroup will continue to meet on a semi–monthly basis to ensure the implementation of WIOA progresses smoothly. Representatives from each of the core partners have agreed on a universal intake strategy. A common intake form and process is being designed to make the customer’s initial entry more assessable into the workforce system and promote the "one system" message across agencies. VR consumers will be made welcome "at any door" and will have access to basic information on obtaining services from each of the core partners.

An inter agency video is also being created to provide a system–wide orientation to the activities of the workforce system promoting "employment" is the joint goal. Sensitivity training will be included in the training for all core partners.

7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

A business engagement team now consists of representatives from the core programs and some of the One–stop partner programs. The joint agency team will conduct outreach to employers to provide information on the services and programs available to them through the Workforce System. VR will be a full partner at the table to ensure that partners are knowledgeable about the needs and accommodations required by persons with disabilities in order to facilitate an integrated workforce.

8. How the agency's strategies will be used to:

A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

Employment being the outcome for all core partners is the common thread. VIDDRS role is to help level the field for persons with disabilities so that partner agencies are able to approach employers and identify opportunities for employment.

B. support innovation and expansion activities; and

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.

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.

B. Describe the factors that impeded the achievement of the goals and priorities.

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.

B. Describe the factors that impeded the achievement of the goals and priorities.

3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

Both SRC and SILC were provided funds for their operations. VIDDRS has made progress in the development of productive relationships with collaborative partners in the community. VIDDRS is now at the table involved in discussions with the Workforce Investment Board in the development of their Strategic Plan and Division of Special Education State Office discussing collaboration on mutually beneficial projects. Collaboration on this level will have had a positive impact on achievement of established goals. These relationships will facilitate consistency in the implementation of services territory-wide.

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.

2. The timing of transition to extended services.

Certifications

Name of designated State agency or designated State unit, as appropriate: Division of Disabilities & Rehabilitation Services

Name of designated State agency: Department of Human Services

Full Name of Authorized Representative: Vivian I. Ebbesen-Fludd, BSN, MS

Title of Authorized Representative: Commissioner
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.
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(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       Government of the Virgin Islands, Department of Human Services
Full Name of Authorized Representative:     Vivian I. Ebbesen-Fludd, BSN, MS
Title of Authorized Representative:           Commissioner

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:

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Applicant’s Organization    Virgin Islands Department of Human Services
Full Name of Authorized Representative:    Vivian I. Ebbesen-Fludd, BSN, MS
Title of Authorized Representative:    Commissioner

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, has developed and will implement,

strategies to address the needs identified in the assessments; and

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

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:

the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act

an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.
Appendix 1: Performance Goals for the Core Programs

<table>
<thead>
<tr>
<th>Year: 2016</th>
<th>Year: 2017</th>
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</thead>
<tbody>
<tr>
<td>Proposed</td>
<td>Negotiated</td>
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<tr>
<td>Expected</td>
<td>Adjusted Level</td>
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</tbody>
</table>

### Employment (Second Quarter after Exit)

| | Proposed | Negotiated |
|----------------|----------------|
| Adults | 31.0% | 33.0% |
| Dislocated Workers | 50.0% | 54.0% |
| Youth | 35.0% | 37.0% |
| Adult Education | Baseline | Baseline |
| Wagner-Peyser | 50.0% | 54.0% |
| Vocational Rehabilitation | Baseline | Baseline |

### Employment (Fourth Quarter after Exit)

| | Proposed | Negotiated |
|----------------|----------------|
| Adults | 35.0% | 37.0% |
| Dislocated Workers | 45.0% | 47.0% |
| Youth | 38.0% | 40.0% |
| Adult Education | B | B |
| Wagner-Peyser | 45.0% | 47.0% |
| Vocational Rehabilitation | B | B |

### Median Earnings (Second Quarter after Exit)

| | Proposed | Negotiated |
|----------------|----------------|
| Adults | $4,500.00 | $4,800.00 |
| Dislocated Workers | $5,000.00 | $5,500.00 |
| Youth | Baseline | Baseline |
| Adult Education | B | B |
| Wagner-Peyser | $5,000.00 | $5,500.00 |
| Vocational Rehabilitation | B | B |

### Credential Attainment Rate

<p>| | Proposed | Negotiated |
|----------------|----------------|
| Adults | 62.0% | 63.0% |
| Dislocated Workers | 48.0% | 50.0% |
| Youth | 40.0% | 43.0% |
| Adult Education | B | B |
| Wagner-Peyser | N/A | N/A |
| Vocational Rehabilitation | B | B |</p>
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<tr>
<th>Measureable Skills Gain</th>
<th>Adults</th>
<th>Dislocated Workers</th>
<th>Youth</th>
<th>Adult Education</th>
<th>Wagner-Peyser</th>
<th>Vocational Rehabilitation</th>
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<tbody>
<tr>
<td>Baseline</td>
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<tbody>
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