

## Wyoming Unified State Plan Comments and Responses

### Overview

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###### (2) Workforce Development, Education and Training Activities Analysis

###### (A) The State's Workforce Development Activities

**Comment:** Page 31: under Sector Partnerships

Should read

".....In a sector partnership to help guide....."

(omit 'will' and replace with 'to')

**Response:** This change will be incorporated into the final state plan.

**Comment:** Page 33: Unclear meaning- 'People first language'

Do we mean to say 'non-native speakers of English'?

**Response:** People First Language is a term of art and will not be changed in the final state plan.

**Comment:** Page 35: third paragraph from the bottom.

'The WIOA Program also allows Incentive payments to youth participants. Incentive payments....'

"Incentive" does not need to be capitalized here.

**Response:** Incentive will be changed to lowercase in the final state plan.

**Comment:** Page 36: This paragraph should be deleted as it repeats what is said in the previous paragraph.

“Fourth, core partners are beginning to develop alternative pathways to enrollments in training and postsecondary enrollments for participants who do not possess a high school credential by leveraging the Ability to Benefit (ATB) clause in Perkins V. In order to gain eligibility to Perkins V funds through ATB, a participant must show their ability to benefit from postsecondary education by fulfilling several options. One of the options Adult Education programs in Wyoming are working on in conjunction with core partners is the completion of at least 6 credit hours or 225 clock hours that are applicable toward Title VI eligible degree or certificate offered by the postsecondary institution. Because many of the local AE programs are located on college campuses, AE programs are working with the parent institution to offer 6 credit scholarships for adult education students. This allows the AE student to enroll concurrently with the postsecondary institution while completing a program of study with adult education.”

**Response:** The commenter is a subject matter expert. This paragraph will be removed from the final state plan.

**Comment:** page 37: change “Many” to ‘Some’ in  
“Many adult education providers...”

**Response:** The suggested change will be incorporated into the final state plan. **(B)**

#### **The Strengths and Weaknesses of Workforce Development Activities.**

**Comment:** Consider adding to page 37, under the heading Section (2) "Workforce Development, Education and Training Activities Analysis" Subsection (B), "Weaknesses of workforce development activities...", as follows:

- Lack of ability to track and address the needs of a locally and nationally growing remote workforce
  - There are currently no programs available to address the unique challenges of this growing sector of the workforce
  - Difficult for R&P to count and classify the metrics pertaining to this current segment of Wyoming's workforce.
  - Lack of training available to One-Stop staff to assist dislocated or otherwise unemployed workers with identifying opportunities in this marketplace.

**Response:** The comment provided will be incorporated into the final state plan.

**(C) State Workforce Development Capacity**

**(b) State Strategic Vision and Goals**

**(c) State Strategy**

**III. Operational Planning Elements**

**(a) State Strategy Implementation**

**(1) State Board Functions**

**(2) Implementation of State Strategy**

**(A) Core Program Activities to Implement the State's Strategy**

**(B) Alignment with Activities outside the Plan**

**Comment:** page 43: top of the page

“GED” should be changed to High School Equivalency Certificate (HSEC).  
This is now the appropriate language to use when referring to this type of credential.

**Response:** This change will be made in the final state plan.

**Comment:** Page 43: needs to be a space between the paragraphs for ‘Northwest Community Action Programs’ and ‘Wyoming Independent Living...’

**Response:** This change will be made in the final state plan.

**(C) Coordination, Alignment and Provision of Services to Individuals**

**Comment:** Page 48: WIOA Adult Priority of Service

“This WIOA requirement” should read “Meeting these WIOA requirements”

**Response:** This change will be made in the final state plan.

**(D) Coordination, Alignment and Provision of Services to Employers**

**(E) Partner Engagement with Educational Institutions**

**(F) Partner Engagement with Other Education and Training Providers**

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

**Comment:** Page 55: Leveraging Resources section

We need to add/discuss the referral system we put in place in 2019 among the core partners on CommunityPro.

Suggestion:

In 2019 WIOA core partners implemented an online referral system utilizing CommunityPro Suite. This system for referrals is a streamlined process which leverages the strength of each core partner's IT reporting system while seamlessly combining the appropriate data directly to users in CommunityPro. WIOA core partners throughout Wyoming are

now able to make both internal and external referrals so that program

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participant needs are met with little or no duplication of services. Since its launch in fall 2019, there has been a total of 349 interagency referrals made across the State.

**Response:** The Wyoming Workforce Development Council is developing an updated referral system for use by the partners. This suggested change will not be incorporated into the final state plan.

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

**(I) Coordinating with Economic Development Strategies**

**(b) State Operating Systems and Policies**

**(i) The state operating systems that will support the implementation of the States Strategies**

**(A) State operating systems that support coordinated implementation of State strategies**

**(B) Data-collection and reporting processes used for all programs and activities, including those present in One-Stop Centers**

**(3) State Program and State Board Overview**

**(A) State Agency Organization**

**(B) State Board**

**(i) Membership Roster**

**(ii) Board Activities**

**(4) Assessment and Evaluation of Programs and One-Stop Program Partners**

**(A) Assessment of Core Programs**

**(B) Assessment of One-Stop Program Partner Programs**

**(C) Previous Assessment Results**

**(D) Evaluation**

**(5) Distribution of Funds for Core Programs**

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

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

**Comment:** Page 65: (ii) & (iv)

*(ii) "Wyoming follows.....to formula allocate funding for Adult Program activities" should be changed to*

*"Wyoming follows....to allocate formula funding for adult program activities."*

*(iv) Wyoming follows.....to formula allocate funding for dislocated worker..."*

*Should be changed to:*

“Wyoming follows....to allocate formula funding for dislocated worker...”

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**Response:** This change will be incorporated into the final state plan.

- (ii) Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3)**
- (iv) Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned**

**Comment:** Page 65: (ii) & (iv)

*(ii) “Wyoming follows.....to formula allocate funding for Adult Program activities” should be changed to*

*“Wyoming follows....to allocate formula funding for adult program activities.”*

*(iv) Wyoming follows.....to formula allocate funding for dislocated worker...”*

*Should be changed to:*

*“Wyoming follows....to allocate formula funding for dislocated worker...”*

**Response:** This change will be incorporated into the final state plan.

**(B) For Title II:**

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

**Comment:** Page 66: For Title II.... (third paragraph)

*“In January 2020, the WCCC implemented a new grant competition for the 2020-25 with 2020-21 being the first grant year of the new cycle.”*

*Delete “the”*

**Response:** This change will be incorporated into the final state plan.

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

**(C) Vocational Rehabilitation Program:**

**(6) Program Data**  
**(A) Data Alignment and Integration**

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

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

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

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

**(B) Assessment of Participant's' Post-Program Success**

**(C) Use of Unemployment Insurance (UI) Wage Record Data**

**(D) Privacy Safeguards**

**(7) Priority of Service for Veterans**

**(8) Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities.**

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

**IV. Coordination with Combined State Plan Programs**

**Comment:** Pages 73 & 74: (9) Do we really mean to repeat everything from (9) into IV Coordination with State Plan Programs? We are saying the exact same thing from one section right into the next

**Response:** Page 74-IV will be deleted and replaced with the following:

Wyoming programs work together both on an ad-hoc basis and through various scheduled meetings. Currently, the core programs meet weekly. Communication flows through various means including telephone, email and during meetings allowing for joint planning and coordination. Additionally, the programs have specified methods of referral ensuring services are coordinated.

**V. Common Assurances**

**VI. Program-Specific State Plan Requirements for Core Programs**

**Adult, Dislocated Worker, and Youth Programs Activities and Assurances (a) General Requirements**

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

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

**(B) Describe the process used for designating local areas**

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

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

**Comment:** Page 77: There are extra bullets showing under 1. One-Stop Operating Budget. These should be deleted.

**Response:** This change will be incorporated into the final state plan.

**(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**

**(B) Describe how the State intends to use Governor's set aside funding.**

**(C) In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.**

**(D) Describe how the State provides early intervention (e.g., Rapid Responses to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed**

**(b) Adult and Dislocated Worker Program Requirements**

**(1) Work-based Training Models**

**(2) Registered Apprenticeship**

**(3) Training Provider Eligibility Procedure**

**(4) Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program**

**Comment:** Page 88: top paragraph

"....skills (and would be appropriate for ESL even if the individual isn't enrolled at the time of WIOA entry into participation."

Need an ending parenthesis.

**Response:** This change will be made in the final state plan.

**(5) Describe the State’s criteria regarding local area transfer of funds between adult and dislocated worker programs**

**(c) Youth Program Requirements**

- (1) Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the**

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**ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts**

- (2) Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in the Plan, required and optional One-Stop partner programs, and any other resources available.**
- (3) Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element.**
- (4) Provide the language contained in the State policy for “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for out-of-school youth specified in WIOA section 29(a)(1)(B)(iii)(VIII) and for “requiring additional assistance to complete an education program, or to secure and hold employment: criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII).**

**Comment:** Page 93 right after the bulleted items:

*“Wyoming does have policy and procedures that addresses...”*

Awkward language. Suggest changing it to:

*“Wyoming has policies and procedures in place that address....”*

**Response:** This suggestion will be incorporated into the final state plan.

- (5) Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i)**

**Comment:** Page 94:

Throughout this entire section, I think we should define TABE as TABE 11/12 as that is the only set of assessments currently approved by OCTAE for reporting purposes.



**Response:** This change will be incorporated into the final state plan.

**(d) Single-area State Requirements**

- (1) Any comments from the public comment period that represent disagreement with the Plan**
- (2) The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State**

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- (3) A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities**
- (4) A description of the roles and resource contributions of the One-Stop partners**
- (5) The competitive process used to award the subgrants and contracts for title I activities**
- (6) How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated.**

**Comment:** Page 96: Incumbent worker training  
The heading for this needs to be in bold print

**Response:** This suggestion will be incorporated into the final state plan.

**(7) How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II**

**Comment:** Page 97: Fourth paragraph

*“This team reviews for alignment of the application to the Wyoming Unified State Plan Governor’s Vision, Goals, Objectives, and Strategies.”*

Needs to be modified to read

*“This team reviews for alignment of the application to the Wyoming Unified State Plan Governor’s Vision, Goals, Objectives, and Strategies as well as to Statewide economic and educational initiatives.”*

**Response:** The final state plan will read, “This team reviews for alignment of the application to the Wyoming Unified State Plan, Governor’s Vision, Mission, and Goals, and statewide economic and educational initiatives.”

**Comment:** Page 97: fifth paragraph, last sentence  
*“The 25% required match will .....”*

Should be modified to read

“The federally required match of 25% will.....”

**Response:** This change will be made in the final state plan.

**(8) Copies of executed cooperative agreements which define how all local services providers will carry out the requirements for integration of and access to the entire set of services available in the One-Stop**

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**delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.**

**(e) Waiver Requests (optional)**

- (1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan**
- (2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers (3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted**
- (4) Describes how the waiver will align with the Department’s priorities (5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and**
- (6) Describes the processes used to:**
  - (A) Monitor the progress in implementing the waiver**
  - (B) Provide notice to any local board affected by the waiver**
  - (C) Provide any local board affected by the waiver an opportunity to comment on the request**
  - (D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver**
  - (E) Collect and report information about waiver outcomes in the State’s WIOA Annual Report**
- (7) The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver**

**Wagner-Peyser Act Program and Agricultural Outreach Plan**

**(AOP) (a) Employment Service Professional Staff Development**

- (1) Describe how the State will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through state employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.**

**Comment:** Pages 106 & 107

Do we mean to repeat the same things from (1) to (2)?

**Response:** Page 106-(1) will be replaced with the following in the final state plan:

Career Services authorized by WIOA categorize services into three delivery strategies: Basic Career Services; Individualized Career Services; and Follow-up Services. The primary services provided by Wagner Peyser staff is Basic Career Services. The State of Wyoming intends to continue utilizing state merit staff and will explore utilizing other staff for Wagner-Peyser. All Basic Career Services must be available and will be coordinated with One-Stop center partners. Individualized Career

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Services may be made available by Wagner-Peyser staff per TEG (Training and Employment Guidance Letter) 3-15. Career Services can be delivered in any order to assist clients to obtain and retain employment.

As stated above the primary services of Wagner-Peyser is Basic Career Services which may include some of the following:

- Outreach, intake, and orientation to the information and services available through the One-Stop delivery system.
- Initial assessment of skill levels, aptitudes, abilities, and supportive service needs.
- Labor exchange services to include:
  - Job search assistance, including placement assistance
- Provision of information related to in-demand occupations, career counseling, and recruitment.
- Services to employers.
  - Referrals to and coordination of activities with other programs and services such as SNAP, Vocational Rehabilitation (VR), Temporary Assistance for Needy Families (TANF), WIOA, etc.
- Provision of performance information and program cost information related to eligible providers of training services.
- Provision of information and assistance regarding filing claims for unemployment compensation.
- Assistance completing financial aid documents for education and training programs.
- Provision of information related to nontraditional employment opportunities.
  - Wage survey analysis on occupations.
  - Job vacancy listings for local labor market areas.
- Information for Unemployment Insurance including meaningful assistance with a direct expedited link to Unemployment Insurance staff.

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

**Comment:** Pages 106 & 107

Do we mean to repeat the same things from (1) to (2)?

**Response:** Page 106 changes will be incorporated into the final state plan. The current response to 107 will not be repeated.

**(3) Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on**

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**identification of UI eligibility issues and referral to UI staff for adjudication**

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

**Comment:** Page 110: 2<sup>nd</sup> paragraph, 2<sup>nd</sup> bulleted item

“Services also include the list of, and information about, eligible training providers.”

Shouldn't 'eligible training providers' be the first bulleted item?

**Response:** The suggested change will be incorporated into the final state plan.

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

**(d) Describe how the state will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following: (1) Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act**

**Comment:** Page 112: 2<sup>nd</sup> full paragraph

*“Each of DWS's programs serves....”*

This is grammatically incorrect. Suggestion:

*“Each DWS program serves.....”*

**Response:** This change will be made in the final state plan.

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

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

**Comment:** Pages 113-115

Throughout this entire section references are made to 'youth'. I think we might want to distinguish between 'in-school' youth and 'out-of-school youth' for each program under discussion. WIOA makes a very

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clear distinction between the two and I think it would be a good idea if our State Plan did the same.

**Response:** The WIOA Title I Program refers to Adult, Dislocated Worker and Youth Programs. In the references with the pages above we want to keep the references general. The requested change will not be made in the final state plan.

**Comment:** Page 113: bottom of the page:

The first paragraph under Adult Education is incomplete information about Adult Education and misrepresents AE as only providing HSEC services. Suggest

"Referrals made to the WCCC's Adult Education (AE) program are made for a wide variety of services, inclusive of:

- Workforce literacy training
- Adult and youth literacy
- Family literacy
- Workplace training programs
- College preparatory literacy
- Digital literacy
  - Integrated and education training programs
  - English as a Second Language and EL Civics
  - High school equivalency certificates

The AE program works closely with DWS to enable adults and out-of-school youth to achieve basic educational goals to those who are lacking appropriate education."

**Response:** This change will be made in the final state plan.

**Comment:** Page 114: University of Wyoming

*“The target populations are....”*

This is awkward. Suggestion:

*“Target populations include....”*

*“If the individuals are qualified the AJC will work with the individual to provide education or training, with the assistance of UW, as needed.”*

Suggest:

*“AJC’s will work in coordination with UW, as needed, to provide education and/or training to qualified individuals.”*

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**Response:** These suggestions will be incorporated into the final state plan.

**Comment:** Page 114: Drug and Alcohol Rehabilitation Centers

*“The target populations of these centers.....”*

Replace “of” with “for”

Another item that reads a bit awkward under this section is

*“Individuals who express their need to stop the use of drugs.....”*

Suggest:

*“Individuals with an expressed need to.....”*

**Response:** This change will be made in the final state plan.

**Comment:** Page 114: WEDA section

*“When populations are uncovered that will benefit from services provided by DWS they are referred to their closest AJC for assistance.”*

This is very awkward and not really clear. I am unable to make a suggestion because I do not understand what is meant by ‘uncovered populations’.

ALSO,

*“Wyoming Department of Administration and Information, Economic Development Division Like WEDA and other economic development groups, DWS relies on the Economic Analysis Division for information. (Commenter: This sentence doesn’t make sense so I don’t know how to help correct it.)*

The Department obtains regular economic reports and demographic information from this unit. The target populations are (Commenter: Target populations include . . . ) adults, dislocated workers, youth, and employers. When populations are uncovered that will benefit from services provided by DWS they are referred to their closest AJC for assistance.” (Commenter: Same as above. First, meaning is not clear and second, we are saying the exact same thing....word for word, in the same paragraph.)

**Response:** No changes will be made to the statement, “When populations are uncovered that will benefit from services provided by DWS they are referred to their closes AJC for assistance.” This statement refers to populations found or discovered in communities that need services will be referred to the nearest AJC.

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The additional recommendations will be incorporated into the final state plan.

**Comment:** Page 114, MET

Need to define what is meant by MSFW’s.

AND

“As MSFWs who need education and training will be served in an AJC, and MET will act as a partner to serve these workers.”

(Commenter: Delete “As”)

(Commenter: “will be served **by** an AJC....”)

**Response:** MSFW will be change to Migrant Seasonal Farm Workers and the additional recommendations will be incorporated into the final state plan.

**Comment:** Page 114, WY DOC

“Referrals will come from DOJ to AJC’s to assist ex-offenders find employment...”

(Commenter: “....from DOJ to AJC’s to help ex-offenders find employment....”)

**Response:** This suggestion will be incorporated into the final state plan.

**Comment:** Page 115: Job Corps

“As youth are discovered at AJCs that would benefit from the structure and services offered by Job Corps, youth will be referred to Job Corps. Likewise, Job Corps will refer any individuals needing assistance finding

work, exploring education and training options, and/or other workforce services to DWS.”

(Commenter: This is awkward. Suggest: “AJC personnel identify ‘youth’ who may benefit from the structured set of services offered by Job Corps and subsequently make appropriate referrals to that program.”)

(Commenter: “any individual” or “individuals” (without ‘any’))

(Commenter: Suggestion:

“Likewise, Job Corps will refer individuals needing assistance in finding employment, education and training opportunities, and/or other services provided by DWS, to the Wyoming Department of Workforce Services.”)

**Response:** The paragraph has been reworked and includes commenter’s suggestions.

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**Comment:** Page 115

Local school districts and secondary schools

Since this is a topic heading each word needs to be capitalized.

ALSO,

“Referrals are made to DWS to assist eligible youth with finding employment, further education and training, and skill training to prepare youth for a sustainable career.”

(Commenter: “...to help eligible in-school youth find employment or pursue higher education/training so that they are equipped with the skills needed for a sustainable career.”)

**Response:** The paragraph has been reworked and now reads, “Wyoming has 48 school districts that govern secondary schools, including alternative schools for at-risk youth. DWS partners with the districts and schools to serve program-eligible youth and others in need. Referrals are made to DWS to help eligible youth find employment or pursue higher education/training so they are equipped with the skills needed for a sustainable career.”

**Comment:** Page 115: Small business Development Centers

Here again, the meaning of ‘uncovered’ is not clear. What type of coverage is being referred to?

**Response:** The reference to uncovered in this section is referring to uncovering the needs of customers through assessments then referring to the appropriate partner. No change will be made to the final state plan.



**Comment:** Page 116: NOWCAP

Towards the end of the section, we once again talk about ‘uncovered populations.’ What is meant by uncovered?

“...clients in this population are uncovered.”

**Response:** The reference to uncovered is when one agency/partner doesn’t cover an unmet financial need then the other agency/partner will explore coverage depending on the program’s allowable expenditures. No change will be made to the final state plan.

**(1) Agricultural Outreach Plan (AOP)**

**(A) An assessment of the agricultural activity in the State means: 1) identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers’ needs in the state; 3) Identifying any**

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**economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State (B) An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics**

**(2) Outreach Activities**

- (A) Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices**
- (B) Providing technical assistance to outreach staff**
- (C) Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues**
- (D) Providing outreach staff professional development activities to ensure they are able to provide high quality services to both jobseekers and employers**
- (E) Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups. If an NFJP grantee with the State Workforce Agency’s (SWA) subrecipient conducting outreach, provide:
  - (i) A description of that relationship**
  - (ii) A description of any other MSFW service providers the NFJP is coordinating with; and**
  - (iii) The NFJP grantee’s outreach plan to be included in the State Plan****

**(3) Services provided to farmworkers and agricultural employers through the One-Stop delivery system.**

**(A) Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the One-Stop delivery system. This includes:**

- (i) How career and training services required under WIOA Title I will be provided to MSFWs through the One-Stop centers;
- (ii) How the State serves agricultural employers and how it intends to improve such services
- (B) Marketing the employment service compliant system to farmworkers and other farmworker advocacy groups
- (C) Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity. (4) Other Requirements
  - (A) Collaboration
  - (B) Review and Public Comment
    - (i) The AOP must include a statement confirming the NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP.
  - (C) Data Assessment

**Comment:** Page 123: Second paragraph

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“Equity ratio indicators in the LEARS Reporting System portray DWS has maintained positive developments in data, and greater staff education and effort, as DWS achieved all five of the five equity ratio indicators for the 3rd quarter of PY 2018.”

(Commenter: “....indicate that DWS...” in lieu of portray

**Response:** This change will be incorporated into the final state plan.

**Comment:** Page 124: third full paragraph.

The last sentences is using a larger font size (or a different font) than the rest of the paragraph. This should be changed.

**Response:** This will be corrected in the final state plan.

- (D) Assessment of progress
- (E) State Monitor Advocate

**Adult Education and Family Literacy Program Activities and Assurances (a) Aligning of Content Standards**

**Comment:** Page 125: AE Section, 2<sup>nd</sup> paragraph

“The College and Career Readiness Standard ensures.....  
(Commenter: Should be “Standards ensure”)

**Response:** This will be corrected in the final state plan.

**(b) Local Activities**

**Comment:** Page 126: Bulleted section

“Eligible providers able to write for these grants are organizations that have demonstrated effectiveness in providing adult education and literacy activities and may include the following:

(Commenter: Delete 2<sup>nd</sup> “and”)

ALSO,

The first bulleted item should be capitalized “Local.....”

**Response:** These corrections will be made in the final state plan.

**Comment:** Page 129: 4<sup>th</sup> Paragraph

Because the Infrastructure Agreement has changed from its original form, we need to delete one sentence in this paragraph.

DELETE

“Referrals are also part of the Infrastructure Agreement put in place for the one-stop system in Wyoming.”

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**Response:** This change cannot be made due to the fact that referrals continue to be a part of the Infrastructure Funding Agreement.

**Comment:** Page 130-First bold section

We need to modify this initial phrase to read as

“The State of Wyoming and the Adult Education Family Literacy Act Definitions and Regulations (AEFLA SEC) 203 WIOA Section 203 defines terms that are specific to the AEFLA as:

**Response:** This change will be made in the final state plan.

**Comment:** Page 131: last item

“IELC” should be “IELCE”

**Response:** This change will be made in the final state plan.

**Comment:** Page 132: Target populations

In parenthesis it should say (State Definition)

**Response:** This change will be made in the final state plan.

**Comment:** Page 134: Under Organization

There should be a line break between the previous paragraph and the sentence beginning with “Primary indicators....”

**Response:** This change will be made in the final state plan.

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

**Comment:** Page 137: Fifth paragraph

“Funding for this program is at the minimum level of \$60,000 statewide and is offered through a competitive grant process at the same time the regular AE grant is completed. Funding is offered to the one program most likely to be successful through community support, business collaboration, and partnerships with AE, as determined by their application.”

(Commenter: “...provider...”) to replace “program” in the second sentence

**Response:** This change will be made in the final state plan.

**(d) Integrated English Literacy and Civics Education Program**

**Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program**

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**Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency**

**Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program**

**(e) State Leadership**

**Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable**

**Comment:** Page 140: bullet item (I) (ii) (V)

The indentation needs to be corrected

**Response:** This change will not be made due to the fact the federal oversight entities will determine final formatting.

**(f) Assessing Quality**

**Comment:** Page 141: List of bulleted items

The indentation for item #2 needs to be corrected

**Response:** This change will not be made due to the fact the federal oversight

entities will determine final formatting.

**(g) Certifications**

**(h) Assurances**

**Vocational Rehabilitation Program Activities and Assurances**

**A. Input of the State Rehabilitation Council**

**Comment:** Overall, we feel that the comments and feedback given by the SRC were considered in the development of this document in Sections A-H.

However, it appears that beginning with Section I, our input was not reflected at all. We appreciate your efforts to respond to our concerns, however, it appears that you ran out of time and from Section I to the end, there was not consideration of our input. The law requires that any input from the SRC that is given be considered and if rejected, why. This should be documented in Section A.

**Response:** On August 19, 2019, the SRC sent DVR a 22 page document with recommendations for the State Plan. The DVR unceasingly worked from this document as it developed a draft version for its section of the state plan. As noted, Section A subsection 3, no recommendations were rejected.

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**(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;**

**Comment: Highlighted Language:** Additionally, the Council and/or sub-committees meet one a month by telephone.

**Comment:** This is no longer the case and should be deleted.

**Response:** The DVR selected to remove this language in the public comment version of the state plan.

**Comment: Highlighted Language:** The Council has received copies of all the Federal and State reports as they are submitted. At quarterly meetings, the Division will continue to provide an informational "dashboard."

**Comment:** We believe we are receiving summary reports of information submitted in place of actual reports. We have NOT received an updated dashboard since May 28, 2019.

**Response:** The DVR will change this language in the final version of the plan.

**(2) The Designated State Unit's response to the Council's input and**

recommendations; and

**No comments received**

- (3) The Designated State Unit's explanations for rejecting any of the Council's input or recommendations.

**No comments received**

**(b) Request for Waiver of Statewideness**

- (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
- (2) The designated State unit will approve each proposed service before it is put into effect; and
- (3) All State Plan requirements will apply

**No comments received**

- (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

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are not carrying out activities through the statewide workforce development system with respect to:

- (1) Federal, State, and local agencies and programs;

**Comment: Highlighted Language:** the

**Comment:** No comment received

**Response:** The DVR selected to remove the clarifying language in the final version of the plan and more specifically that portion now lists "Project Search".

**Comment: Highlighted Language:** Local to participate in the school's transition services activities.

**Comment:** No comment received

**Response:** The DVR selected to remove the clarifying language in the final version of the plan and more specifically that portion now lists "Vocational Counseling Transition Services".

- (2) State programs carried out under section 4 of the Assistive Technology Act of 1998;
- (3) Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture
- (4) Non-educational agencies serving out-of-school youth; and

**Comment: Highlighted Language:** and

**Comment:** Should this section include partnership referrals from WIOA Youth programs as well as Adult Education too? I am also aware that counselors reach out to adjudicated youth, homeless youth, youth in treatment facilities, etc. We recommend actually listing "Other entities" to the degree possible.

**Response:** The DVR will implement this recommendation into the final version of the plan.

**(5) State use contracting programs.**

**Division of Workers' Compensation**

**Comment: Highlighted Language:** The Wyoming

**Comment:** No comment provided.

**Response:** DVR will implement this recommendation into the final version of the plan.

**Comment: Highlighted Language:** Central Wyoming Community College **Comment:** I believe that this is incorrect. Centrum for Disability Services was located on Casper College's campus. Should they be consulted to

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ensure the accuracy of this paragraph? Should the fact that Centrum provides SSA benefits counseling services for the state as well?

**Response:** The DVR will implement this recommendation into the final version of the plan.

**Comment: Highlighted Language:** services

**Comment:** Page 152: first paragraph-last sentence

Over the past year, Wyoming Relay collaborated with Wyoming AARP, senior citizen centers and high school services organizations to provide statewide training on using smartphones, tablets, and other telecommunication devices, accessibility features, and apps including those apps for individuals with hearing loss or speech disabilities. "...service..." (no 's')

**Response:** This change will be incorporated into the final state plan.

**(d) Coordination with Education Officials. Describe:**

**(1) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of Division of**

**Vocational Rehabilitation (Division or DVR) services, including pre employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.**

**Comment: Highlighted Language:** The transition consultants participate **Comment:** Do you plan to update this section once new consultant roles and responsibilities are determined?

**Response:** The DVR will update this section once roles and responsibilities have been finalized.

**Comment: Highlighted Language:** youth

**Comment:** Should something about 504 students be included in this information section?

**Response:** No, because transition students by our definition include the 504, IEP, and non-disclosed students with disabilities. The language will remain the same.

**Comment: Highlighted Language:** the

**Comment:** No comment received.

**Response:** In the draft version of the plan the word “the” was repeated. This was corrected in the final version provided for public comment.

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**(2) Information on the formal interagency agreement with the State educational agency with respect to:**

**Comment: Highlighted Language:** “In addition to the State-level memorandum of understanding, cooperation between DVR and local education agencies ensures that a transition team is established to develop and accomplish objectives and long-term goals. These teams meet for individualized education program development and scheduled planning sessions. The planning sessions, which include parents and consumers, determine the transition schedule from the school system to vocational rehabilitation to facilitate the completion of the individual education program and in order to develop the individual plan for employment of an eligible transition—age youth prior to that individual leaving the school setting. This process also includes students with disabilities who are not receiving services under the Individuals with Disabilities Education Act (IDEA).

Community team members participating in the planning sessions may include youth case managers from WIOA, representatives from an IL Agency, representatives from higher education or vocational programs, community rehabilitation service providers, and advocates. With a comprehensive transition team, the referral process is enhanced,



outreach is improved, roles are more clearly defined, and transition services are coordinated. Assessments, consultations, and technical assistance are also provided to local education agencies and students. Individual meetings and community planning sessions allow DVR to help complete individual plans for employment for each student with a disability who is eligible for vocational rehabilitation services before the student leaves the school setting.”

**Comment:** This makes it sound like each community has a formal team that meets to strategize for transition. Outside of the IEP process, I am unaware of such a team. Can you please clarify this section?

**Response:** This language will be revised in the final version of the plan.

**Comment: Highlighted Language:** who consultant coordinate  
(fifth paragraph)

**Comment:** No comment provided.

**Response:** No, because transition students by our definition include the 504, IEP, and non-disclosed students with disabilities. The language will remain the same.

**(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**

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**Comment: Highlighted Language:** (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

**Comment:** Should this section speak more to the relationship to be developed between VR and schools to foster information sharing, training opportunities, and family/community awareness

resources? **Response:** The DVR will revise this language in the final version of the plan.

**Comment:** Page 155: (A) & (B)

Both say exactly the same thing. Is this correct?

**Response:** This is correct. No changes will be made to the final state plan based on this comment.

**(B) Transition planning by personnel of the designated State**

**agency and educational agency that facilitates the development and implementation of their individualized education programs**

**Comment: Highlighted Language:** (B) Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs

**Comment:** Should this section speak more to the role that VR will play in the transition process to include things like participation in transition planning meetings, collaborative goal setting and service plans that have shared responsibility and coordinated efforts?

**Response:** The DVR will revise this language in the final version of the plan.

**Comment:** Page 155: (A) & (B)

Both say exactly the same thing. Is this correct?

**Response:** This is correct. No changes will be made to the final state plan based on this comment.

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

**Comment: Highlighted Language:** Such former students as shall be eligible for services customarily provided by the Division to adults over age 21. ???.  
(Paragraph 11)

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**Comment:** Students over the age of 21 are not eligible for public education services.

**Response:** The DVR will revise the language in the final version of the state plan.

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

**Comment: Highlighted Language:** Educaiton; Divison

**Response:** These typographical errors were corrected prior to posting the Plan for public comment.

**(e) Cooperative Agreements with Private Nonprofit Organizations. (f) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services. Describe the designated**

**State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.**

**Comment: Highlighted Language:** The DVR works closely with all partners identified in the Workforce Innovation and Opportunity Act (WIOA) to collaborate in continued efforts to implement the law. DVR staff serve on agency workgroups, task forces, Workforce Development Council, and local Next Gen Workforce Committees.  
(third paragraph, second bullet)

**Comment:** We question whether or not some commentary about the status of Next Gen partnerships should clarify that some regions are still in the development phase of doing this?

**Response:** While some areas have active next Gen groups, some areas do not. The DVR will implement clarifying language in the final version of the plan.

**(g) Coordination with Employers. Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:**

**(1) VR services and the following:**

**Comment: Highlighted Language:** Employment First Consultant is **Comment:** Would it make more sense to word this in a way that shows the commitment to the work rather than the PERSON doing the work since the role is changing? le) The Division is committed to develop collaborative relationships with community employers. To this end, the

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Division maintains an Employment First website, conducts meetings with local businesses to provide information about the services and supports provided by the Division and works to establish employer groups to share successes and challenges in the employment of individuals with disabilities in their community...

**Response:** The DVR will revise this language in the final version of the plan.

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

**Comment: Highlighted Language:** Transition Consultants

**Comment:** Again, Transition Consultant roles are being phased out. Should this reflect the work and not the position? This should reflect the

plans for the 2020 cycle not what has been done in the past.

**Response:** The DVR will revise this language in the final version of the plan.

**Comment: Highlighted Language:** County

(Third paragraph, first bullet point)

**Comment:** I like listing some of the projects that have been established through PreETS services to meet the needs of youth across the state!

**Response:** Thank you for your comment. This language will remain in the final version.

**Comment: Highlighted Language:** In Laramie, Project Search is ongoing.

Additionally, there is the ongoing

(Third paragraph, ninth bullet point)

**Comment:** Eliminate. Already listed above.

**Response:** The DVR will revise this language in the final version of the plan.

**Comment: Highlighted Language:** involvement

(Eighteenth bullet point)

**Comment:** Should we include efforts to share model programs across the state that may be able to be replicated?

**Response:** The DVR feels the existing language lists many model programs across the state that could be replicated. We are evaluating our service delivery plan and are exploring opportunities to conduct pilot projects in other areas of the state.

**(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**

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**opportunities for competitive integrated employment, to the greatest extent practicable:**

**(1) The State Medicaid plan under title XIX of the Social Security Act;**

**Comment: Highlighted Language:** (now Behavioral Health Division)

(Third paragraph, first sentence)

**Comment:** Should this be updated to reflect the change in alignment to Medicaid/Medicare finance?

**Response:** The Department of Health created a new division named "Division of Health Care Financing." This is the Division that has oversight over Medicaid/Medicare financing. The DVR is currently working with them

to develop a new MOU.

- (2) The State agency responsible for providing services for individuals with developmental disabilities; and
- (3) The State agency responsible for providing mental health services.

**Comment: Highlighted Language:** Wyoming Department of Health/Behavior Health Division

**Comment:** No comment provided

**Response:** The DVR will implement this change in the final version of the plan.

- (i) **Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development. Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:**

**Comment: Highlighted Language:** 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:

**Comment:** instructional text

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

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- (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;**

**Comment: Highlighted Language:** 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;

**Comment:** Should the instruction for this section be eliminated from the actual plan?

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

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

**Comment: Highlighted Language:** 0

**Comment:** No comment received

**Response:** This was a typographical error. The DVR currently has 1 area manager vacancy for region 2. This will be clarified in the final version of the plan.

**(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.**

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**Comment: Highlighted Language:** 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.

**Comment:** Again, are these instructions needed in the actual plan's text?

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**Comment: Highlighted Language:** The Division of Vocational Rehabilitation anticipates the need to recruit at least 8 Qualified VR Counselors in the next five-year period. This includes vacancies for four vocational rehabilitation counselors who are eligible for retirement in the next five years.

**Comment:** The need for expansion of counselors is only partially explained by the anticipated retirements. What is the cause for the additional 4 counselor positions? Population growth? Services expansion? Reduction of caseload?

**Response:** The number of estimated recruitments is based on anticipated retirements and estimated turnover.

**Comment: Highlighted Language:** The Division of Vocational Rehabilitation anticipates the need to recruit three Administrative Assistant positions and eight VR Counselor positions over the next five years.

**Comment:** Same as comment above. Also, partially redundant as it could be combined with the paragraph above.

**Response:** The number of Administrative Assistant positions estimated to be recruited is based on anticipated retirements.

**(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;**

Wyoming does not have an institution of higher education that trains rehabilitation professionals. The three nearest such programs are at the

University of Northern Colorado, Utah State University, and Montana State University. These programs concentrate on private and public rehabilitation respectively. The DVR also uses Assumption College as an optional location for distance education. All

programs are certified by the Council on Rehabilitation Education.

**Comment: Highlighted Language:** 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; Wyoming does not have an institution of higher education that trains rehabilitation professionals. The three nearest such programs are at the University of Northern Colorado, Utah State University, and Montana State University. These programs concentrate on private and public rehabilitation respectively. The DVR also uses Assumption College as an optional location for distance education. All programs are certified by the Council on Rehabilitation Education. (ii) The number of students enrolled at each of those institutions, broken down by type of program; and

**Comment:** Instructional text

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**(ii) The number of students enrolled at each of those institutions, broken down by type of program; and**

**Comment: Highlighted Language:** Currently, there are 18 people in DVR with certified rehabilitation counselor credentials. Four counselors are working on Master's degrees in rehabilitation counseling at Utah State University, three of which are enrolled with RSA funds. Three more are attending Assumption College, one of which is enrolled with RSA funds.

**Comment:** This doesn't account for all 28 counselors in place. Also, would this section be better explained by talking about the Division's commitment to a qualified counselor pool and then stating that % of counselors currently hold CRC credentials. % are currently attending RSA sponsored education programs to obtain master's degrees in counseling. I don't know what Assumption College's program is for? Is this also master's level counseling training? Undergraduate training? CRC training? Should this be explained or at least defined rather than

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stating the institution of study? How many of the counselors are currently in a probationary status?"

**Response:** Staff who attend Assumption College are enrolled in an accredited MRC program. This will be revised in the final version. The DVR does not wish to use



percentages in this section at this time.

**(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.**

**Comment: Highlighted Language:** broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

**Comment:** Instructional text. For the comment...Does graduation with a master's degree automatically indicate credential for certification of licensure as stated in the instructions? Does it need further explanation?

**Response:** Completing a master's degree in rehabilitation counseling does not automatically include the certified rehabilitation counseling license (CRC). It does make you eligible to sit for the CRC exam. The only way to become a CRC is to successfully complete that exam. The DVR will provide clarifying language in the final version of the state plan.

**Comment: Highlighted Language:** Rehabilitation

**Comment:** No comment provided

**Response:** The typographical error was corrected in the version provided for public comment.

**(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,**

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**including personnel from minority backgrounds and personnel who are individuals with disabilities.**

**Comment: Highlighted Language:** 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 who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

**Comment:** Instructional text.

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**Comment: Highlighted Language:** In December 2019, the Wyoming Attorney General's Office approved a new Education Contract that allows for the DVR to seek reimbursement of costs.

**Comment:** Is this only a partial paragraph? Should it be included in the paragraph prior to the FUTURES GROUP language?

**Response:** This recommendation will be implemented into the final version of the plan.

**(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**

**Comment: Highlighted Language:** 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:

**Comment:** Instructional text

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**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.**

**Comment: Highlighted Language:** Of 28 counselors, 10 have certified rehabilitation counselor credentials, ten have a master's degree without such credentials, eight have a bachelor's degree. Of 11 administration staff (which includes four area managers and the transition consultants), eight have certified rehabilitation counselor credentials.

**Comment:** This data seems to contradict an earlier statement under Section B Personnel: Currently, 18 people in the Division with certified rehabilitation counselor credentials. Four counselors are working on master's degrees in rehabilitation counseling at Utah State University, three of which are enrolled with RSA funds. Three more are attending Assumption College, one of which is enrolled with RSA funds. This needs to be clarified for accuracy and doesn't need to be stated twice.

**Response:** The DVR will implement clarifying language into the final version of the plan.

#### **(4) Staff Development**

**(A) A system of staff development 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**

**Comment: Highlighted Language:** A system of staff development 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

**Comment:** Instructional text.

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**(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. Procedures to disseminate research.**

**Comment: Highlighted Language:** Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

**Comment:** Instructional text

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**(5) Personnel to Address Individual Communication Needs.**

**Comment: Highlighted Language:** visually impaired people. Other needs for blind or visually impaired individuals

**Comment:** People first language preferred here.

**Response:** The DVR will revise this language in the final version of the plan.

**(6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act**

**Comment: Highlighted Language:** consultants

**Comment:** No comment provided

**Response:** This will be deleted in the final version of the plan.

**(j) Statewide Assessment**

**(1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:**

**(A) With the most significant disabilities, including their need for supported employment services;**

**Comment: Highlighted Language:** the Wyoming Department of Health's Behavioral Health Division (the Medicaid Waiver Program) (fifth paragraph, seventh bullet)

**Comment:** We need clarification of language- the DD Waiver Program currently falls under the Department of Healthcare Financing, Developmental Disabilities Section and the Department of Behavioral Health is the mental health component.

**Response:** The DVR will implement clarifying language into the final version of the plan.

**Comment: Highlighted Language:**

- Continue to recruit SE providers to work in the rural areas. This will likely need to include recruitment of individual service providers because of the lack of community rehabilitation programs in the rural areas of the State.
- Encourage parents and/or care providers to apply for Medicaid waiver services while their child is in high school.
- Recruit Community Rehabilitation Programs (CRPs) that are willing to apply for and become Employment Networks for the Social Security Administration's Ticket to Work program so that they can utilize these EN's for extended service provision for individuals that require the SE service model but do not qualify for the Medicaid Waiver program.
  - Consider implementing a team approach to Supported Employment emphasizing the culture of everyone succeeding together.
- Engage in cross-training across systems and providers on SE and specialized supports to increase services and outcomes.
  - Provide means for training in IPS and CE to increase DVR's ability to serve people with the most significant needs.
- Consider funding CE training and development to increase the number of individuals who could benefit in terms of an employment outcome and the number of qualified providers willing to offer customized employment services.
- Share expertise and resources with recovery programs and provide training to counselors and providers on ways to help consumers address the multiple dimensions of recovery.
- Augment these benefits planning services with training for staff and providers on strategies that contribute to the pursuit of work above the level of SGA, including self-sufficiency for SSA beneficiaries.

**Comment:** So happy to see many of the concerns being targeted in VR practices moving forward. I would like to see a more specific strategic plan developed rather than just statements in support... ie) provide and promote ACRE and CESP training access in rural areas, provide graduated payment schedules promoting increased levels of training and experience, work with LEA partners to recruit and promote VR opportunities to work as service providers in rural areas, provide TA for interested parties seeking EN status under Ticket to Work, open. It would be helpful to have baseline information and goal setting standards- for example, how many rural area SE providers are there? How many would we like to see developed?

**Response:** The language listed are recommendations from the CSNA. The DVR is

currently evaluating all aspects of its service delivery model and do not

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have anything more specific to add at this time. As such, the language will remain the same.

**(B) who are minorities;  
(C) who have been unserved or underserved by  
the VR program**

**Comment: Highlighted Language:** Attempt to work collaboratively with the Tribal VR programs to increase the incidence of shared cases between the programs.

**Comment:** Is there a specific plan that should be included ie) Consultant will reach out to tribal leadership to establish collaborative planning meeting to increase VR shared client referrals, participate in offered trainings, solicit information about barriers to working together, etc.? Perhaps clarifying objectives and responsibilities of the MOU with Tribal VR would be helpful. The state plan should include guidelines of how this will occur.

**Response:** The DVR is prioritizing the updating of all MOUs. This language will be revised in the final version of the plan.

**(D) who have been served through other  
components of the statewide workforce  
development system; and  
(E) who are youth with disabilities and students  
with disabilities, including, as appropriate,  
their need for pre-employment transition  
services or other transition services.**

**Comment: Highlighted Language:** This data reinforces the need to provide youth with disabilities every opportunity to participate in work experiences and learn what is required in the world of work. The provision of pre employment transition services represents an important first

opportunity to reach students with disabilities in Wyoming and across the Nation.

**Comment:** Should this include a statement regarding Wyoming DVR's commitment to increasing access and services under PreETS as well as strengthening partnerships with DD Service agencies to promote Employment First thinking and use of customized and supported employment opportunities?

**Response:** The DVR is already doing this in many areas of our state. In addition to DVR's commitment to provide more Pre-ETS services and reach rural communities with our services. The DVR also collaborates with the Governor's Council on Developmental Disabilities to promote

Employment First and will be working with WIOA partners to increase services to students and youth with disabilities. This language will be added to the final version of the plan.

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**(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and**

**Comment: Highlighted Language:** Response Statement: The Division in collaboration with the State Rehabilitation Council will work to:  
**Comment:** Should language be added regarding work with CRPs and the DD Waiver system to recruit new providers, especially in rural areas and provide access or support to work related certification training such as ACRE, CESP, Discovery processes? What about changing the language from consider to “explore with agency partners” the creation of guidance documents for CRPs to be included on both agency websites for access by interested parties?  
Ensure that MOU development addresses this common concern (recruiting service providers in the DD/Children’s Mental Health Waiver world is also a concern). Has there been any continued discussion on the new Scale of Services/Fees from VR in collaboration with agency parnters?”

**Response:** The DVR will revise some of this language for the final version of the plan. The action steps were taken directly from the CSNA. The DVR is currently working on developing a fee service schedule but it is not complete at this time.

**(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**

**Comment: Highlighted Language:** Response Statement: The Division in collaboration with the State Rehabilitation Council will work to:  
**Comment:** What about sharing the findings of the CSNA with our school partners? Can we better coordinate the access to and delivery of key services in transition planning?  
Tribal VR is already working to do this data sharing with not only agency partners but also the community at large.

**Response:** The action steps were taken directly from the CSNA. The DVR is not opposed to sharing the finding of the CSNA with anyone as it is a public document. The CSNA is located on the DVR section of the Department of Workforce Services website. There is also a hard copy

in each DVR field office. The DVR is currently evaluating its service delivery model and has nothing more specific to add at this time. As such the language will remain unchanged.

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**(k) Annual Estimates. Describe:**

**(1) The number of individuals in the State who are eligible for services;**

**Comment: Highlighted Language:** The number of individuals in the State who are eligible for services

**Comment:** I curious about the data source used to identify eligibility numbers. The US Census Bureau 2016 is used, but the CSNA (table 19 p. 29) shows table of VR services from 2015-2018 with specific case numbers served 2015(4469); 2016(4865); 2017(5237); 2018(5018). These numbers may include PreETS individuals served as well, but appear to show a trend for eligibility and service with average costs per case. Would this information be more appropriate here? I feel like some historic data in this section would improve the rationale behind the estimates given. Also, the break down of Title I and Title VI Part B SE monies seems like it belongs under part 2 rather than 1.”

**Response:** It is the DVR’s understanding that this section is to be an estimate for the upcoming year. The given estimate was derived from 2019 data (not available at the time the CSNA was conducted). As such, the language will remain unchanged.

**(2) The number of eligible individuals who will receive services under:**

**(A) The VR Program;**

**(B) The Supported Employment program; and**

**(C) Each priority category, if under an order of selection;**

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

**(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.**

**(l) State Goals and Priorities. The designated State unit must: (1)**

**Identify 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.**



**Comment:** Highlighted Language: (1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

**Comment:** Instructional text

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**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**Comment: Highlighted Language:** The Division of Vocational Rehabilitation (DVR) is committed to assisting individuals with disabilities obtain competitive integrated employment, economic self-sufficiency, personal independence and full inclusion into the community. In 2019, the Wyoming Workforce Development Council established new goals for the Wyoming Department of Workforce Services, which includes DVR. DVR has not had a chance to jointly develop goals and priorities relating to this edict.

**Comment:** I don't think this statement is true. I feel like the SRC provided specific input into the development of the State Plan and made specific suggestions for possible goals for the state. The Division and SRC membership met and reviewed priority goals based on these recommendations. The SRC was provided early access to review and give additional input on finalized state goals prior to the submission of the plan. I think this indicates quite a bit of joint development activity that has not been seen in many years!"

**Response:** The DVR developed its content for the state plan in conjunction with the August 2019 recommendations from the SRC. It did not however, have a chance to develop goals based from the Workforce Development Council (which were approved in December 2019). As such, clarifying language will be implemented into the final version of the plan.

**(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;**

**Comment:** Page 184: (A), (B), & (C)

All three say exactly the same thing. Is this correct?

**Response:** This is correct. No changes will be made to the final state plan based on this comment.

**(B) the State's performance under the performance accountability measures section of 116 of WIOA; and**

**Comment:** Page 184: (A), (B), & (C)

All three say exactly the same thing. Is this correct?

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**Response:** This is correct. No changes will be made to the final state plan based on this comment.

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

**Comment:** Page 184: (A), (B), & (C)

All three say exactly the same thing. Is this correct?

**Response:** This is correct. No changes will be made to the final state plan based on this comment.

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

**Comment:** No Comment Received

**Response:** Goal 5 was released as: Goal 5: Use career pathways to prepare individuals with disabilities for career opportunities in all industries. This was a misprint and shall revert back to, Goal 5: Use career pathways to prepare the Wyoming workforce for career opportunities in all industries. The overarching Goals for the State's workforce must be broad enough to include all program's target populations.

**Comment: Highlighted Language:** Goal 6: Students will enter their adult lives capable of self-advocacy with sufficient experience to make choices about work and career, being appropriately supported and living as independently as possible.

**Comment:** I don't think this is a measurable goal. Instead, it would be better to write the goal in terms of what VR and EDU will do to promote this as an outcome for transition aged students

**Response:** The DVR will revise this language in the final version of the plan.

**Comment: Highlighted Language:** Goal 7: A strong statewide community with DVR

presence and partnerships with business, services providers, schools, State government, workforce partners and service organizations.

**Comment:** I think goal 4 already speaks to this expectation. The goal as written may be intended to provide additional collaborative components- if this is the case, it should say so

**Response:** The DVR will revise this language in the final version of the plan.

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**Comment: Highlighted Language:** Goal 8: A VR service delivery system that results in enhanced earnings, benefits, and retention for underserved populations and individuals with the most significant disabilities.

**Comment:** Again, this isn't a measurable goal. It should be worded as statement of what will be done using an action verb "increase, promote, add, work with..." It is a desired outcome but how will it be achieved?"

**Response:** The DVR will revise this language in the final version of the plan.

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

**Comment: Highlighted Language:** These goals were developed by the Wyoming Workforce Development Council, an analysis of the comprehensive statewide assessment; and the performance of the DVR's accomplishment in meeting the standards and indicators.

**Comment:** This statement is not necessary as it is addressed under Part A below.

**Response:** The federal oversight entities require each section contain a response. This language will remain as written.

**(A) The most recent comprehensive statewide assessment, including any updates;**

**Comment: Highlighted Language:** These goals were developed by the Wyoming Workforce Development Council, an analysis of the comprehensive statewide assessment; and the performance of the Division's accomplishment in meeting standards and indicators.

**Comment:** When were the Workforce Development Goals developed? Are they new to this plan or continuing from a previous cycle? DVR additionally proposed goals reflect areas of concern identified in the most recent CSNA of 2019.

**Response:** The Goals were established through feedback provided at several listening sessions, online survey in mid 2019, and discussions at Wyoming Workforce Development Council meetings specifically for the purpose of inclusion in the 2020 State Unified Plan. It is important to note that these goals need to be high-level to ensure all programs have

the latitude to serve target populations.

**(B) the State's performance under the performance accountability measures of section 116 and WIOA; and**

**Comment: Highlighted Language:** These goals were developed by the Wyoming Workforce Development Council, an analysis of the comprehensive

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statewide assessment; and the performance of the Division's accomplishment in meeting standards and indicators.

**Comment:** This should speak to the revisions made to previous goals based on performance accountability measures. Were past goals met? If not, are they continued with changes? Were new goals developed because previous goals are no longer needed? I don't feel the statement here meets the expectation. Since a specific section of WIOA Section 16 is identified, I think specific data collected for this requirement should be cited.

**Response:** This language will be revised in the final version of the plan.

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

**Comment: Highlighted Language:** These goals were developed by the Wyoming Workforce Development Council, an analysis of the comprehensive statewide assessment; and the performance of the Division's accomplishment in meeting standards and indicators.

**Comment:** Again, I feel this section is not adequately addressed as it does not speak to SRC input and audit findings or corrective action plans.

**Response:** The language will be changed in the final version of the plan.

**(m) Order of Section. Describe:**

**(1) Whether the designated State unit will implement an order of selection. If so, describe:**

**(A) The order to be followed in selecting eligible individuals to be provided VR services.**

**(B) The justification for the order.**

**(C) The service and outcome goals.**

**(D) The time within which these goals may be achieved for individuals in each priority**

- category within the order.
- (E) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and
- (2) If the designated State unit has elected to sever eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.
- (n) Goals and Plans for Distribution of title VI Funds.

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- (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.

**Comment: Highlighted Language:** funds  
(third paragraph)

**Comment:** I'm confused by this statement and its location. The allocation is \$300,000 but we only expect to spend \$75,000 and supplement it with Title I monies? Is this in the event that the allocation is not received or changes? How will additional or remaining dollars be used? Would this be better placed after the other paragraphs as a closing summary statement to this section? Are these dollars being equally distributed between the four regions? Do monies transfer between regions using the money and those not using the funds actively?

**Response:** According to Title IV rules, we currently don't have enough youth that warrants releasing the full amount for expenditure.

- (2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:
- (A) 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.

No comments received

- (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.

**Comment: Highlighted Language:** dicaid waiver funds are available for extended services and expanded supported employment opportunities for youth with the most significant disabilities through the public-school system and Medicaid waiver services.

**Comment:** This is an awkward paragraph. Should it speak to the use of comparable and/or collaborative services from public schools and third party liability agreements for long term supports for individuals under the Medicaid Waiver systems?

**Response:** The DVR will revise language in the final version of the plan.

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**(o) States 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 427 of the General Education Provisions Act (GEPA)):**

**(1) The methods to be used to expand and improve services to individuals with disabilities.**

**Comment: Highlighted Language:** 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))

**Comment:** Instructional text.

**Response:** The federal oversight entities will likely retain this language in the final plan. The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**Comment: Highlighted Language:** The Division proposes additional strategies based on goals taken from the analysis of the comprehensive statewide needs assessment

**Comment:** I would argue that the stated goals for 6-8 are not goals but outcomes. The strategies are actually goals and do not include the methods to be used to attain the desired improvements. If you look at the wording of the Workforce Development Council goals and strategies, they are worded as action steps with methods for change. The VR section fails to do this.

Goal 6: Use VR services and State Plan partner relationships to ensure that students will receive education, training, and experiences that

promote self-advocacy, choice, and the necessary supports to work and live as independently as possible.

Strategy 6.1- Create relationships with post-secondary institutions to coordinate VR services for clients accessing post-secondary programs.

6.2- Increase access to post-secondary counseling and work based training opportunities for transition aged youth exploring their employment future.

6.3-Increase outreach efforts and training to (but to whom/what agency/organization) in the use of informed choice strategies to enhance effective communication for youth who are deaf and hard of hearing

Etc...

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Goal 7- Increase the presence of VR services and partnerships across the state

7.1 Provide in-service and training to VR staff and agency partners to increase the capacity and quality of VR services delivered

7.2- Strengthen partnerships with businesses by...

7.3- Meet with Eastern Shoshone tribal leaders to establish a working relationship and VR collaboration for mutual clients

7.4- Include cultural sensitivity and awareness training topics in state training of VR staff to increase and strengthen services to minority groups

Etc....".

**Response:** The DVR will review this language prior to the submission of the final plan.

**(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.**

**Comment: Highlighted Language:** A broad range of assistive technology services and assistive technology devices are provided to individuals with disabilities at each stage of the rehabilitation process. DVR uses the Centrum for Disabilities, a non-profit agency that provides assistive technology evaluations and equipment to clients throughout the state. The DVR also regularly collaborates with the Wyoming Institute for Disabilities (WIND) and Wyoming Assistive Technology Resources (WATR) when helping consumers evaluate and meet their assistive

technology needs.

**Comment:** What about working with local school teams to identify viable technology supports and trainings for students as a part of their transition plans as well as making recommendations to VR counselors in Summary of Performance reports upon exit?

How do clients receive training on AT that is provided to them? Does VR participate in this as a part of the service delivery plan?

**Response:** The language is based on all consumers and not specific to transition consumers. The language will remain the same.

**(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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**Comment: Highlighted Language:** The DVR is committed to developing outreach efforts to Hispanic community groups in order to cultivate relationships to encourage referrals.

(second paragraph, second sentence)

**Comment:** How is the division committed? Is there going to be an increase in marketing of services available? Will there be coordination with community partners who ARE working with these populations (employer groups, community religious organizations, social groups, schools?) Instead of considering the idea of meeting with people in their communities, why not pilot this as a model that could be replicated? These sound more like wish statements than action steps.

**Response:** The recommendation to meet with people in their respective communities was taken specifically from the CSNA as a more effective way to work with the Hispanic population. DVR will revise this language in the final version of the plan.

**Comment: Highlighted Language:** The DVR has a formal cooperative agreement with each AIOVRS Program and is working to update both agreements. **Comment:** Is this correct Elizabeth? You had indicated earlier that there was NOT a current MOU in place. Also, my understanding was the there is currently no active relationship with the Eastern Shoshone tribe. This was even mentioned earlier in the document.

There are two Native American 121 Tribal Vocational Rehabilitation programs in Wyoming. These programs are the Northern Arapaho and Eastern Shoshone VR programs. Of these two Tribal VR programs, DVR works most closely with the Northern Arapaho program. There is considerable room for growth in the relationship as it relates to co enrollment of consumers and shared services. This does happen with the Northern Arapaho program, but is non-existent with the Eastern



Shoshone.

**Response:** The MOU with Northern Arapahoe was signed in 2010. The MOU with Shoshone Business Council was signed in 2008. There were not specific expiration dates in either MOU and copies are maintained by the DVR Administrator. As such, the language will remain. The draft also specifically notes the DVR is working to update these MOUs.

**(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).**

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**Comment: Highlighted Language:** 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).

**Comment:** My comment on all of these sections is to ensure that the strategy statements actually cite a strategy or method to be used rather than just a desired outcome. I think this is present for goals 1-5 but not for goals 6-8.

**Response:** The DVR will review this language prior to the submission of the final plan.

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

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

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

**(8) How the agency's strategies will be used to:**

**(A) Achieve goals and priorities by the State, consistent with the comprehensive needs assessment:**

**(B) Support innovation and expansion activities; and**

**Comment: Highlighted Language:** (B) Support innovation and expansion activities; and

**Comment:** I feel like the only commitment here are those required by the Rehab Act. What other things can we be doing to explore innovative methods and expansion services? We talked about exploring the use of technology to increase outreach and access. Suggestions were made for increasing collaborative efforts for cross-training and sharing of resources across agency partners to address underserved or unserved populations. What about citing specific programs that have been put in place to build program services for individuals with SPMI or dual diagnosis and addiction?

I also think that steps have been taken to strengthen the interaction and partnership between VR and the SRC. I think it may be appropriate to discuss some of the historical limitations of the relationship and the efforts that have been made to improve the partnership.

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**Response:** The DVR is in the process of evaluating all areas of need and is not ready to include specific projects at this time.

**(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.**

**Comment: Highlighted Language:** 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.

**Comment:** What about issues around literacy and access to VR services including accessing/reading/completing applications, understanding VR documents and literature, providing access to text to speech versions and computers for individuals who may be homeless? These were concerns that were noted and should be addressed in practice or policy.

**Response:** The DVR is in the process of evaluating all areas of need and is not ready to include specific projects at this time.

**Comment: Highlighted Language:** DVR staff work with all WIOA partner offices to assure physical access, program access, and services access.  
(bullet 12)

**Comment:** This was the assumption from VR but at least in Casper, individuals reported that this WAS NOT happening for individuals who may have recently been or are homeless and illiterate.

**Response:** The DVR is unaware of any reports of consumers who are homeless or illiterate not being served. The DVR Administrator is primarily based out of Casper at this time and disagrees with this insinuation. As such, this language will remain unchanged.

**(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.**

**Comment: Highlighted Language:** The Division successfully rehabilitated 652 individuals with disabilities. In The federal fiscal year 2019, the DVR worked with 674 clients who self-identified as something other than white, non-Hispanic. In FFY 2019, the Division worked with 1,805

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transition clients. The DVR worked with 159 identified veterans in FFY 2019.

**Comment:** This is incomplete. I think it should be shown as goal and results. For example:

Goal 1- Increase employment opportunities for individuals with disabilities in Wyoming

Target: Rehabilitate 715 individuals

Result: The Division successfully rehabilitated 652 Individuals

1.2 - Target: Increase services to minority individuals with Disabilities (what was the 2018 service number?)

Result: 674 clients served who identified as something other than white, non-Hispanic. An increase/decrease of \_\_

1.3 – Target: Improve services to students and youth in transition from school to work (baseline information needed –number served in 2018 data)

Result: FFY 2019 1805 transition clients served

Etc.

Then in B- talk about why goals were hit or not hit. What helped/interfered with the plans of the previous State Plan? The statement may speak to the missed target 1 but doesn't address the other areas at all.

**Response:** Baseline data from 2017 (last time state plan was updated) is 590 successfully rehabilitated, 262 other than white, non-Hispanic, 1017 transition students. 216 veterans. This language will be revised in the final version of the plan.

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

**Comment: Highlighted Language:** Goal 2. Increase by 5 percent the number of clients using the Small Business Development Fund and other resources for starting a small business. In FFY 2019, the DVR worked with 30 clients to use this fund. Overall, the DVR is seeing a downtrend in our total overall number of clients, which presents challenges in finding clients to open small businesses, as well as difficulty with the economy and the ability to support the development of small business.

**Comment:** No baseline is provided so you don't know if the number of 30 is close or way off. What about addressing the need to explore new options for small business development other than the vending machines that have been used for years? This is definitely an option that can work well for some of the most significantly involved individuals and one that Marc Gold and Associates has done a lot of work with through

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the Discovery process. Also, I don't think this is an area that is explored or included at all in the Pre-ETS activities occurring. Could models similar to Vertical Harvest be used to further expand on this idea?

**Response:** The small business development that we do is not limited to vending machines. Vending machines in state buildings is part of the funding mechanism that we utilize to establish a variety of small businesses. In FFY 2017, we closed 41 small business consumers.

**Comment: Highlighted Language:** Goal 3. Successfully rehabilitate 205 or more supported employment individuals with the most significant disabilities. In FFY 2019, the DVR worked with 82 such persons. The DVR continues to have a healthy relationship with our CRPs and the Developmental Disabled Division. We are able to keep up referrals and find the

necessary support to be successfully employed. Wyoming has also adopted an Employment 1<sup>st</sup> initiative, where anyone on the Waiver services are encouraged to seek out employment before seeking other options. The DVR struggles with coding people as supported employment, because we do not have enough youth to allow us to work with the adult population.

**Comment:** I don't understand this explanation at all! What does coding and youth have to do with each other? I know CRPs are actively seeking ways to bring in older workers who never had the opportunities of Pre ETS or transition planning to support employment. What measures are

being taken to specifically support employment of these folks? How about strengthening the E1 opportunities with the exploration of a new MOU with the Medicaid Waiver programs? What about mentioning lack of resources in rural areas where CRPs aren't present? I think there are a lot of issues at play here that should be included. If for no other reason, than to establish a baseline statement to grow from.

**Response:** Due to changes in how the supported employment grant is required to be spent, DVR has a challenge in spending all of the grant funds. We are required to provide the same level of funding to youth as we do adults. We do not have enough youth needing to have these services in order for us to provide the services to adults. We have identified that staff not coding youth properly as one of the causes of not maximizing this fund. We are working on ways to train staff to improve this outcome. In FFY 17 we served 360 persons with Supported employment services.

**Comment: Highlighted Language:** Goal 4. Continue to improve the recruitment, training, and retention of staff.

**Comment:** I think a contributing factor that should be mentioned is the lack of incentive pay scales to motivate counselors to obtain required educational components and remain in position once trained. I think you have identified this problem and even have a strategy you have

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implemented and another you are working on to address this very issue. They should be mentioned as impacting these goals.

**Response:** Incentive pay scales would have to be approved by the Department of Administration and Information, State Personnel Division. This is something they have not wished to pursue.

**Comment: Highlighted Language:** The DVR is starting to see some improvement in this area.

**Comment:** Can you support this with comparative data from the previous year or is this just a gut feeling?

**Response:** The DVR will delete this sentence for clarity.

**Comment: Highlighted Language:** Increase training on disability topics relevant to staff needs and agency goals. Train staff on Federal, State, and agency policies and procedures. In 2019, the Division conducted regional in service training for all counselors, managers, and consultants. Many of the topics covered included information on various types of disabilities. Other topics included case management, counseling skills, and leadership development.

**Comment:** So was the previous goal met or not met? There is no comparative data and no statement as to whether this was achieved. My assumption is that it was not since you are adding more options to

enhance and improve training.

**Response:** The DVR will revise this language in the final version of the plan.

**Comment: Highlighted Language:** Due to the challenges caused by the economic downturn, the State of Wyoming overall lost population, and often our staff had to leave the state to be with their spouse who had to seek other employment.

**Comment:** This wording is awkward. I would word something like, while staff retention rates have improved since calendar year 2016, this goal was not met. Contributing factors to turnover included economic downturn, lost population in the state, spousal transfers or moves, and movement of staff to new job opportunities due to new levels of education obtained or dissatisfaction with job growth opportunities and pay scales. Then, some of the changes implemented make more sense limit the ability to “move on” to greener pastures at the cost of VR educational opportunities, work with the state to provide incentives for growth experiences.

**Response:** The DVR will implement this recommendation into the final version of the plan.

**Comment: Highlighted Language:** Goal 5. Improve services to transition—age clients by increasing successful outcomes by 5 percent. In the Federal

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fiscal year 2019, the Division closed 66 transition client cases successfully. With the shift towards providing PreETS services, there will be less clients that are included in the General VR data. The Division is working on building up the number of participants on the PreETS side of things.

**Comment:** Again. This doesn't explain if the goal was achieved. You are separating Pre-ETS and VR services, but the goal doesn't make this distinction. You could break out data to show the shift, but overall, it isn't the reason we did or did not serve transition aged youth. FY 2019 had Pre-ETS requirements already in place, so this should be defined as how many Pre-ETS clients were served 2018 compared to 2019 as well as how many VR youth clients were successfully closed in 2018 vs. 2019. This section is looking for reasons why goals were or were not met. Not strategies to address. Those should have been identified in the newly developed goals.

**Response:** In FFY 17, we served 54 transition-aged individuals. Because of Pre-ETS, more students are being served under this category of services and are gaining the skills and abilities to successfully advocate for themselves and locate employment without having the need to apply and be made eligible for the full battery of DVR services.

**Comment: Highlighted Language:** Goal 6. Increase the percentage of ABI clients

successfully employed by 5 percent. In FFY 2019, the Division successfully closed 29 ABI clients. Part of the change in this number may be due to how our staff is classifying clients in the new case management system, as well as the overall decline in clients that the Division has been experiencing.

**Comment:** You reference a change but don't explain what it was. Where did we start? Where are we now? Why?

**Response:** In FFY 17, we served 20 ABI consumers. We will continue to work with staff to code clients correctly in the case management system in order to ensure that we are continuing to serve this population to the best of our ability. This will be added to the final version.

**Comment: Highlighted Language:** Goal 7. Increase the percentage of SPMI clients successfully employed by 5 percent. In FFY 2017, the Division successfully closed 424 SPMI clients. Part of the change in this number may be due to how our staff is classifying clients in the new case management system, as well as the overall decline in clients that the Division has been experiencing.

**Comment:** You speak to the 2017 data (shouldn't this be based on 2018 figures) but fail to mention the 2019 date to show where we are now. I think further explanation is needed to understand the change in classification. How were they previously entered, how are they now entered? It may be that the change prohibits you from being able to

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even address the goal as written. If that is the case, then you should state so.

**Response:** The sentence in the state plan should be 2019. In FFY 17, we closed 181 SPMI consumers. As such, there is a significant increase which will be revised in the final version of the plan.

**(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.**

**Comment: Highlighted Language:** Historically, Wyoming does not have enough Youth requiring Supported Employment services. The Division was unable to serve as many adults as the youth, so the adults were served under general rehabilitation funds.

**Comment:** Should this be addressed through the goals/strategies above? What is the reason for this?

**Response:** Due to the changes in the requirements on how the SE grant funds can be spent, DVR has been struggling to fully expend the funds from the grant. We must spend the same amount on adults in SE as we do with youth in SE. This limits the number of clients that we have classified as SE and creates problems with DVR meeting this goal.

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

**Comment: Highlighted Language:** The state's low unemployment rate affects achievement of goals and priorities. When the unemployment rate is high, there is an increase in applicants for services as well as increased difficulty with finding competitive employment. When it is low, there is a decrease in the number of people applying for services.

**Comment:** So, given the lower numbers served, were they proportionate to the number successfully served based on the goal? You could cite that while we didn't make our numbers, we did meet our percentage of success for those who were served- or did we?

**Response:** Because WY has low unemployment, not only do we see that our lower caseload numbers, the consumers that we do have require more services to be gainfully employed. Most of the available jobs are not the easiest for our consumers to be successful.

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

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**Comment: Highlighted Language:** For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following

indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
  - Employment (Fourth Quarter after Exit);
  - Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as "baseline, pursuant to section 116(d) of WIOA." The actual performance data reported by these programs for indicators designated as "baseline" for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

**Comment:** Instructional text.

**Response:** The federal oversight entities will likely retain this language in the final plan.



The State entities selected to carry the requirement through to the final public comment version of the Plan to ensure continuity.

**Comment: Highlighted Language:** In PY 2017, the Division reported a 31.1% Measurable Skill Gain for all reportable individuals. In PY 2018, the number increased to 33.3%. The Division will continue to monitor this and make changes as necessary. As more staff understand what is acceptable as an indicator of a gained skill, this number should increase. **Comment:** Does this increase fall in line with the expected growth percentages to have met the standard? This indicates that the reason the Measurable Skill Gain was not met is due to lack of staff understanding. Is this the only contributing factor? Shouldn't this report include the baseline statements for PY2020 and PY 2021 as stated in the instructions with a statement that they are baseline data only?

**Response:** Based on the information that we have received from RSA and the anticipation of continued improvement, the DVR is setting a baseline goal of 35% for PY 20 and 40% for PY 21. Both of these numbers are above the reported national average for all VR agencies.

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

**Comment: Highlighted Language:** How the funds reserved for innovation and expansion (I&E) activities were utilized.

**Comment:** Can you provide more information on how these dollars are spent? Do SRC and SILC meet these requirements?"

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**Response:** The DVR believes that an adequate description of expenditures was given. As such, the language will remain unchanged.

**Comment: Highlighted Language:** 15,262.35

**Comment:** Our budget shows year-end total spending of \$18,208.90 by the SRC (Oct 1-Sept 30, 2019).

**Response:** According to the latest reports from our fiscal department, SRC only spent \$16,197.35. This will be added to the final version of the plan.

**(q) Quality, Scope, and Extent of Supported Employment Services. Including 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:**

**Comment: Highlighted Language:** Ensuring that quality supported employment (SE)

services are being provided to individuals with the most significant disabilities in Wyoming is a priority for the Division. Quality is measured by more than just the number of individuals who receive supported employment services. Quality also incorporates key values such as self-determinism; choice; person-centered supports; quality of life; and full inclusion.

The Division of Vocational Rehabilitation (DVR or Division) is committed to providing quality supported employment services to individuals with disabilities. Providing training to VR counselors and supported employment service providers is essential to improving services. The Division has already conducted some training with DVR staff on this topic and more is planned. The Division is also tasking its program consultants to develop training that can assist service providers with understanding DVR's services and how to transition the individual to long-term support as needed.

**Comment:** Should this include CSNA data showing satisfaction of services based on these categories of need?

**Response:** The implementation of having program consultants develop training for service providers comes from CSNA findings. The language will remain the same.

## **(2) The Timing of Transition To Extended Services.**

### **Assurances**

**Comment: Highlighted Language:** Public Comment on Policies and Procedures

**Comment:** What is the process for public comment on this plan? It should be detailed!"

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**Response:** In the final Plan released for public comment this section was provided for as a Yes/No question and answered in the affirmative. As such, no further action is required by DVR.

## **VII. Program-Specific Requirements for Combined State Plan Partner Programs**

N/A

