

NORTHERN MARIANAS PYS 2022-2023 (MOD)

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I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

This is a unified plan

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

The Commonwealth of the Northern Mariana Islands (CNMI) economy remains fragile as the islands experience both positive and negative effects of being dependent on its lone standing industry in Tourism and Hospitality to build its economy upon. As the CNMI was about to experience an economic boom from the inclusion of a new Casino industry, due to a mix of uncontrollable external factors such as natural disasters (Super Typhoons), national policies and laws, and more recently the effects of Covid-19 virus on the world, the islands are on the verge of a complete economic collapse. In addition, due to the CNMI's small population base and remote location, the existing shortage or access to a readily available, qualified, and well-trained U.S. workforce continues to be an added challenge in meeting the economy's workforce demand.

During these challenging times, outside of investing in a new industry to stabilize the economy, investment in Human capital continues to be the most essential and much needed component of the CNMI's economic development. Preparing the CNMI's U.S. workforce to be skilled yet flexible enough to participate in various industries, is seen to be key factor to providing support for the islands existing industries, and for the CNMI's ability to attract new investments that would help stabilize the economy. Due to its limited population base, the CNMI has been relying upon foreign workers known as Commonwealth Workers or CWs to supplement the workforce shortage of skilled U.S. workers. Recognizing that it does not have the sufficient workforce to populate its private and public sector pipelines, there is continuous efforts to focus on getting the CNMI's available workforce, especially those unemployed and needing additional education and training, including individuals with disabilities and those experiencing other barriers to employment, to build upon their confidence and leadership abilities to be competitive and skilled workers and fill the demand. Another key initiative continues to be preparing the existing government employees to shift from public to private sector employment which is seen to also play a critical role in the sustainability of the CNMI's private sector economy. Although these two short-term remedies may help, the demand still far exceeds the supply of workers available and needed to sustain and/or meet the CNMI's fragile economy.

A long term strategy seen by the CNMI State Workforce Development Board to provide a steady pool of skilled U.S. workers is through the integration of workforce development programs at an individual's early stage of life starting from elementary-junior- to high school leadership, confidence, and work ethics skills and subsequently gain work experience through the WIOA Title One service delivery programs. The CNMI must position itself to embrace a new economy and workforce derived from the experiences and lessons learned from being reliant upon having all the eggs in a single industry as its main means for economic development and stability. The progression of the its past silo mentality of a workforce development system into a new interdependent system of educated, skilled, and competitive workforce opportunities and revamped eco-system is long due. Opportunities are seen in the development of promising career pathways as an integral workforce development strategy and initiative that will bring the CNMI's human capital development to the levels of competitiveness locally, regionally, and globally. In addition, job-driven training (e.g., work experience, OJT, internship, etc.) and customized training will help individuals to better meet the needs of employers and thus increase opportunities for job placement.

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

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

Consistent with the requirements of the WIOA and the federal guidance's that follow, the Core Programs (Titles I, II, and IV) of the Commonwealth of the Northern Mariana Islands (CNMI) mid-year modification for Program Years 2022 and 2023 is focused on improving the CNMI's workforce development system through:

- Innovative initiatives to streamline the service delivery system for universal access and equity.
- Enhance Business Engagement activities to increase partnerships.
- Expansion of training opportunities for the employment and/or reemployment of customers that include supportive services offerings.
- Continuous improvements in performance accountability.

The CNMI faced tremendous challenges resulting from the disastrous back-to-back typhoons and the now COVID-19 pandemic. Since our last submission, unemployment was at an ultimate high as the CNMI's primary revenue source, Tourism, collapsed at the height of the pandemic impacting the associated service industries to include the public sector.

Federal assistance provided the much-needed relief from the loss of income experienced by the affected workers and businesses both public and private. As the CNMI's economy slowly rebounds, greater emphasis is placed on overcoming the oppositions and adapting to the new normal post pandemic.

II. STRATEGIC ELEMENTS

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

1. ECONOMIC AND WORKFORCE ANALYSIS

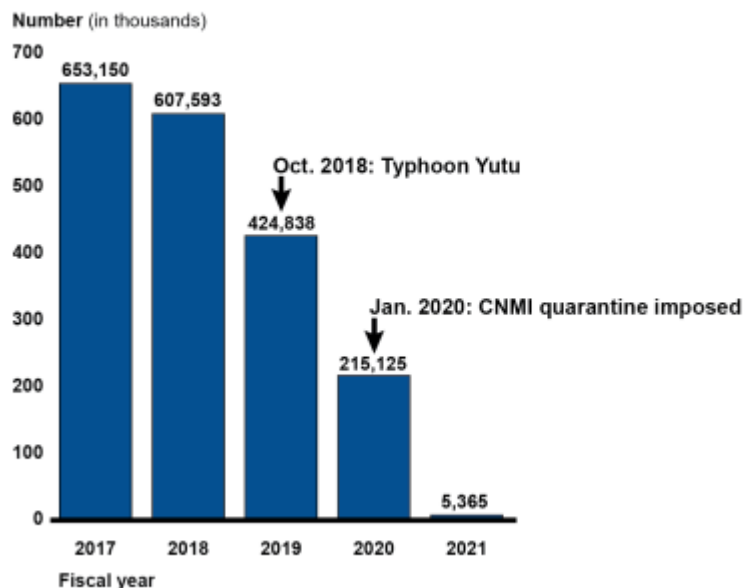
Economic Analysis

The COVID-19 pandemic crippled the CNMI's top economic drivers: Tourism, Hospitality, and Gaming industries. In the recent report published by the US Governmental Accountability Office or GAO, visitor arrivals substantially decreased in March 2020 in comparison to the previous

year. An 85 percent decrease from March 2019. The waning on the tourism industry trickled down on the associated sectors further reducing economic activity and revenues in both the public and private sectors.

Recognizing the resounding uncertainties in the economy, businesses have either had to reduce operations, temporarily shut down, or in worse cases close completely. Likewise, Figure 3 of the GAO 2022 Report reflects signs of a weakening economy as visitor arrivals was at a continuum decline from Fiscal Years 2017-2021.

Figure 3: Commonwealth of the Northern Mariana Islands (CNMI) Annual Visitor Arrivals, Fiscal Years 2017–2021



Source: GAO analysis of CNMI Marianas Visitors Authority data. | GAO-22-105271

GAO 2022 Report

The CNMI's silver lining of hope for a stable economy revolves around both federal and local government support and the infusion of fresh revenues into the islands and the creation of new jobs in unforeseen industries such as cyber-security, agriculture, mari-culture, marijuana and hemp production along with back to basic small businesses that provide for the basic needs of human livelihoods, such as the production of safe drinking water, food, fuel, safety, health care, education, among other equally important factors.

In an effort to revive the economy, a "Travel Bubble" plan was piloted. As reported by Governor's Council of Economic Advisers Annual Report of 2021, the Marianas became the first destination in the region to successfully negotiate and establish a Tourism Bubble with South Korea. This bubble and the protocols established by the Marianas Visitors Authority and the COVID-19 Task Force saw the arrival of 2,984 Korean visitors between July 2021 and October 2021. This surge in the Korean market provided 80% greater arrivals than the total arrivals from all origin countries in that same timeframe in 2020.

Existing Demand Industry Sectors and Occupations

In the US Government Accountability Office (GAO) May 2022 report, the CNMI's economy was already at a decline prior to the COVID-19 pandemic due to the devastations to the islands from Super Typhoon Yutu. The economic impacts of the pandemic accelerated the collapse of the Hospitality industry provoking greater burdens to the CNMI's already weakened economy. Recent data published by the Bureau of Economic Analysis (BEA) shows a continuing decline of the

CNMI's Gross Domestic Product (GDP) in 2018 to 2019. In 2018, the CNMI's GDP was reported at 19.3 and reduced to 11.2 percent in 2019. The decline is attributed to the reduction in visitor arrivals and trades associated to Tourism activities. This is the most current GDP for the CNMI as the estimates for 2020 has yet to be released.

Based on the GAO May 2022 report, the pandemic consequentially impacted the tourism industry. GAO's analysis of visitor arrival data shows a steady decline from 2017 to 2021. From arrivals reaching the hundred thousand in 2017 to a low thousand in 2021. Appropriately, the CNMI's demand industry sectors experienced a shift. The CNMI's Department of Labor reported that between 2015 to 2019, the top five (5) most sought after occupations by employers were:

1. Construction and Extraction

These include electricians, masons, carpenters, etc.

2. Installation, Maintenance, and Repair

Occupations such as auto mechanics, electronic repairer, glass installers, etc.

3. Building and Grounds Cleaning and Maintenance

These include pest control workers, maids and housekeeping cleaners, etc.

4. Food Preparation and Serving Related

Occupations such as chefs, cooks, wait staff, etc.

5. Personal Care and Service

Includes jobs as sales clerks, childcare services, tour guides, home health care services, etc.

Emerging Demand Industry Sectors and Occupations

The priorities of the administration of Governor Ralph Dlg Torres is to diversify the CNMI's economy to include growing new industries in agriculture, technology, and high-end tourism aimed at improving the quality of lives for CNMI residents. Despite the challenges from back to back typhoons and the ongoing pandemic, the following industry emerged and lays the foundations to revive existing industries significantly impacted by the disasters.

Cannabis Industry

In an attempt to diversify the CNMI's ailing economy, the CNMI government passed two laws focused on Recreational/Medicinal Marijuana and the Hemp Industries. The Taulamwaar Sensible CNMI Cannabis Act of 2018, PL 20-66, was enacted and amended in 2019 as PL 21-05 that established the CNMI Cannabis Commission. Despite the setbacks from the ongoing COVID-19 pandemic, the inception of the Cannabis industry launched in August 2020.

In its infancy, the industry has generated over \$170k in monthly gross revenues. Data collected by the CNMI's Cannabis shows the industry created approximately thirty-two (32) jobs in manufacturing and retail sales.

Occupations in Cannabis Manufacturing:

POSITION TITLE	# OF POSITIONS	ANNUAL SALARY	PT/FT
Cannabis Production Technician	1	\$ 6,864.00	Part-time
Owner Operator	1	\$ -	Part-time
Owner	1	\$ 41,000.00	Full-time
Grower	1	\$ 40,000.00	Full-time
Head Grower	1	\$ 30,000.00	Full-time
Grower Assistant	1	\$ 12,000.00	Full-time
Admin Manager	1	\$ 30,000.00	Full-time
Admin Assistant	1	\$ 12,000.00	Full-time
Production Manager	1	\$ 30,000.00	Full-time
Assistant Production Manager	1	\$ 29,120.00	Full-time
Assistant Production Manager	1	\$ 22,880.00	Full-time
Farmer	1	\$ 31,200.00	Full-time
Farm Assistant	1	\$ 22,880.00	Full-time
Farm Assistant	1	\$ 22,880.00	Full-time
Farm Assistant	1	\$ 22,880.00	Full-time
Farm Assistant	1	\$ 18,720.00	Full-time
Farm Assistant	1	\$ 7,540.00	Part-time
No. of Positions:	17	\$ 379,964.00	3 PT / 14 FT

CNMI Cannabis Commission Presentation to the 22nd Legislature Cannabis Committee March 2022

Occupations in Cannabis Retail Sales:

POSITION TITLE	# OF POSITION	ANNUAL SALARY	PT/FT
Retailer Sales Associate	1	\$ 12,844.00	Part-time
Operation Manager	1	\$ 30,000.00	Part-time
Security Guard	1	\$ 12,000.00	Part-time
Budtender	1	\$ 8,476.00	Part-time
Budtender	1	\$ 8,476.00	Part-time
Budtender	1	\$ 6,630.00	Part-time
Store Manager	1	\$ 15,600.00	Part-time
Retail Operations Director	1	\$ 18,000.00	Full-time
Retail Manager	1	\$ 24,960.00	Full-time
Bud Tender	1	\$ 20,800.00	Full-time
Bud Tender	1	\$ 10,400.00	Part-time
Bud Tender	1	\$ 10,400.00	Part-time
Bud Tender	1	\$ 8,320.00	Part-time
Bud Tender	1	\$ 8,320.00	Part-time
Bud Tender	1	\$ 8,320.00	Part-time
No. of Positions:	15	\$ 203,546.00	12 PT / 3 FT

CNMI Cannabis Commission Presentation to the 22nd Legislature Cannabis Committee

Commercial Fishing Industry

The Governor's Council of Economic (GCEA) Advisers 2021 Annual Report includes recommendations to support the Commercial Fishing Industry in the CNMI. While the industry has been in existence, the industry was not spared from the impacts of the decline in the tourism industry. The GCEA recognizes fisheries to be economically viable beyond the ongoing pandemic.

Occupations in the commercial fishing include: Boat/Vessel Captains, Fishermen, Processors, and Brokers.

Tourism Revitalization

Tourism is the CNMI's primary economic driver. The challenges that arose from the global pandemic, collapsed the tourism industry and its associated sectors. A focus of the GCEA is to revive the market through the Tourism Resumption Investment Program or TRIP allowing a "bubble" of visitors from neighboring countries into the CNMI and foster economic activity.

The resumption of the Tourism industry brings back the associated occupations in Food Preparation and Serving Related Occupations; Sales and Related Occupations; Building, Grounds Keeping, and maintenance occupations.

The CNMI is also exploring the Information Technology industry due to the growth of the need for cyber-security, online business and services. Other emerging industries and/or occupations that emerged due to the impact of Covid-19 in the reduction of imported goods into the CNMI, include Agriculture, Aquaculture, Food Production, Food Safety, and Food Security, In relation, Healthcare and Technical occupations; Architecture and Engineering occupations; and Protective Services occupations are anticipated to be on the rise as the islands try to stabilize and rebuild. The associated occupations include:

Information Technology

Networkers, Cyber-Security, Data Processing, Telemarketing, Online sales, Online services, Engineers, Coders, etc.

Agriculture and Food Security

Agriculturalists, Aqua-culturalists, Researchers, Scientists, Added Value Food Production, Food Safety, Food Security, Farmers, Ranchers, etc.

Others

Healthcare and Technical occupations; Architecture and Engineering occupations; and Protective Services occupations, etc.

Employers' Employment Needs

Noting the extraordinary workforce challenges in the CNMI, the State Workforce Development Board (SWDB) conducted the 2021 Business Needs Assessment (BNA) to identify present and future needs of the private sector. The top respondents to the survey include those from the following industry groups: Accommodations and Food Services, Food Services, Construction, and Professional, Scientific, Technical Services, and Other Services (except public administration).

As a result of the survey, the following workforce challenges were identified:

- Outmigration of quality workers
- Retention of workers – improve benefits
- Training and/or retraining to meet the current skills demands of employers.

Additional findings from the survey include training needs in the following areas:

- Customer Service
- Management
- Trades
- Sales
- Accounting
- Sales

Other needs include: Writing, Advocacy, Animal Handling, Apprenticeship, Childcare, Graphic Arts, HR, Insurance, Interior Design, Operations, Safety, Security, and Taxes.

In response to the survey, the SWDB expanded the program offerings of the Eligible Training Provider List that includes certifications in the Vocational Trades; USDOL OA Approved

Registered Apprenticeship Programs, Allied Health Certifications, First Responders Certification, Post-secondary degree programs, etc.

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA⁴. This population must include individuals with disabilities among other groups⁵ in the State and across regions identified by the State. This includes—

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

[5] Veterans, unemployed workers, and youth, and others that the State may identify.

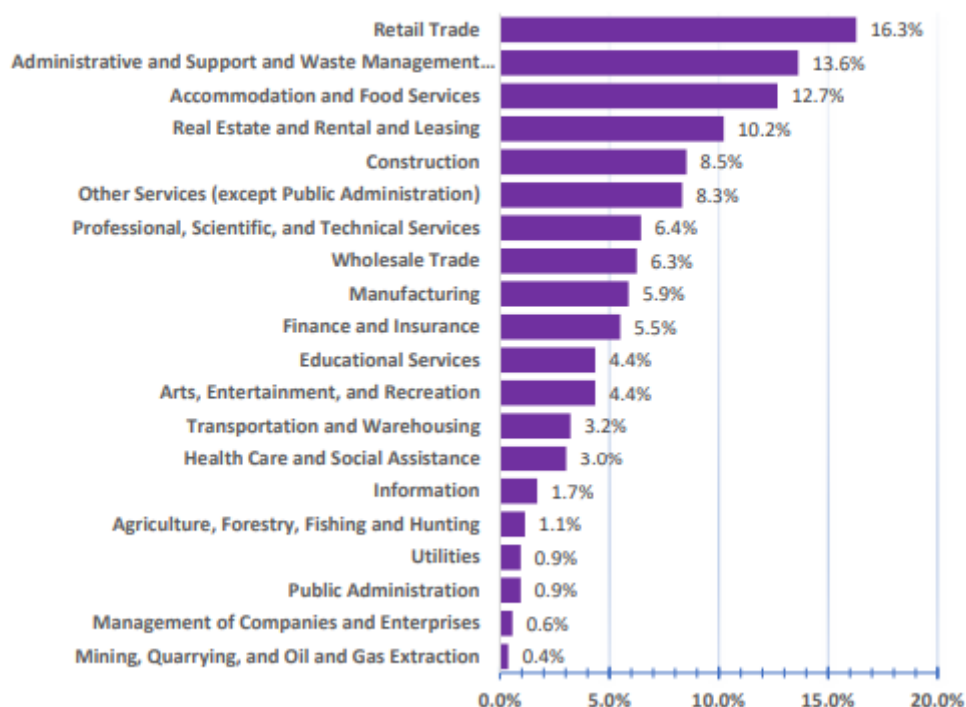
The following data sets were extracted from the latest available set of data (2017) generated by the CNMI Department of Commerce Central Statistics Division CNMI Labor Force Participation released May 2018 provides the following information:

According to the 2020 CNMI Census Data, the CNMI's population is 47,329. This is a decrease of 6,554 or 12.2% change from the 2010 census data. The May 2020 report produced by the Governmental Accountability Office (GAO, May 2020), reported a total of 23,840 employed workers in the CNMI for 2020. For years, the CNMI's jobs were predominately held by foreign workers and evolved in 2019 and 2020 to U.S. workers as the majority and the balance of available jobs held by foreign workers. The decrease in foreign workers is accredited to U.S. Public Law 115-218, Commonwealth-Only Transition Worker Program, which ends in 2030.

The 2021 Prevailing Wage Survey (2021 PWS) released annually by the CNMI's Department of Commerce Central Statistics Division reported the employers by major industry and occupation groups.

Chart 3.a of the 2021 PWS shows the top industries for the surveyed period:

**Chart 3.a Percentage of Total Employers by Major Industry:
2021 PWS, CNMI**



Public sector employment remains the main employer in the CNMI reported as employing 22.8% on the 2021 PWS, Accommodation and Food Services at 10.3%; Educational Services at 10.1%; Retail Trade at 8.0%; Administrative and Support and Waste Management at 7.5%; Health Care and Social Assistance 7.5%; Construction 6.8%; Transportation and Warehousing 5.4%; Utilities 3.3%; and Manufacturing at 3.0%.

i. Employment and Unemployment

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

The CNMI's most current official unemployment and labor force participation data is the 2017 Labor Force Participation Report. Unemployment and labor force participant by island and district is reported below:

Unemployment Rate by Island and District

The unemployment rate was highest in Saipan at 10.8%, followed by Rota at 9.0%, then Tinian at 6.8%. Within Saipan and by district, District 5 had the highest unemployment rate of 14.7%, followed by District 2 at 12.8%, District 1 at 10.8%, District 4 at 10.1%, and District 3 at 8.4%.

Labor Force Participation Rate by Island and District

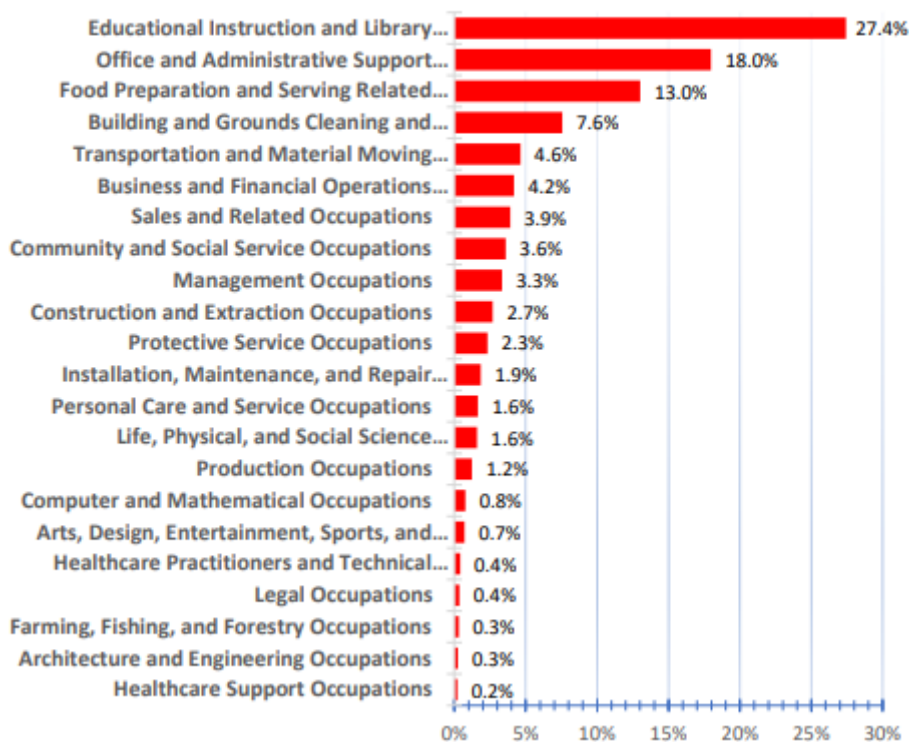
In the 4th Quarter of 2017, the labor force participation rate in the CNMI was highest in Rota 70.2%, followed by Saipan 67.1%, then Tinian at 65.0%. Within Saipan and by district, District 2 had the highest LFP rate of 72.7%, followed by District 3 at 70.2%, District 1 at 65.7%, while District 4 and 5 had similar LFP rate at 62%.

As reported in the GCEA 2021 Annual Report, the employment of over 10,000 workers in the listed occupational groups were directly impacted by the COVID-19 pandemic.

Occupation Group	Claimants per Occupation	% Of Total Claims
Office and Administrative Support ⁶	2,364	12.45%
Food Preparation and Serving Related	2,202	11.60%
Management	2,064	10.87%
Sales and Related	1,979	10.43%
Personal Care and Service	1,810	9.53%

Pending the release of the CNMI's current unemployment rate, a spike in the unemployment rate is expected as a direct result of the decline of the CNMI's economy. The 2020 PWS reported about 30% of employers have either laid off or furloughed employees and/or reduced work hours between January and July 2020. Additionally, the report included COVID-19 related lay offs by occupational groups:

**Chart 8.4 Percentage of Total Employees Laid Off Due to COVID-19
by SOC Major Group: 2020 PWS, CNMI**



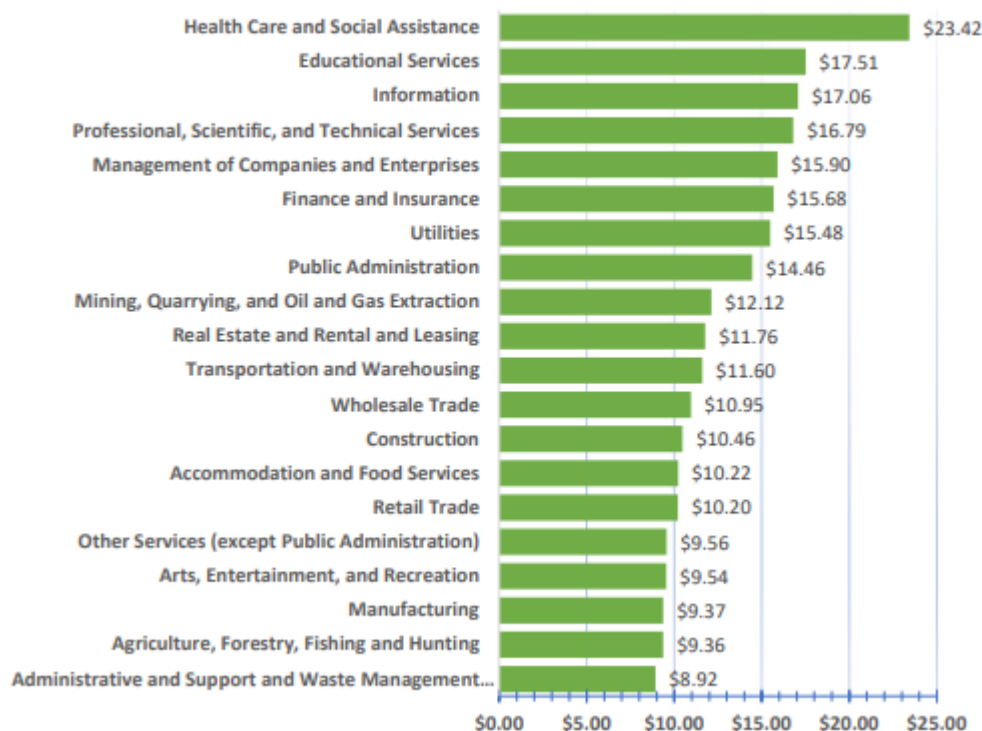
ii. Labor Market Trends

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

At the onset of the COVID-19 pandemic, the 2020 PWS reported the top 10 industries and occupations were in Public Administration, Accommodation and Food Services, Educational Services, Administrative and Support and Waste Management, Retail Trade, Health Care and Social Assistance, Transportation and Warehousing, Construction, Manufacturing, and Arts, Entertainment, and Recreation.

Furthermore, the 2021 PWS charted the earnings by hour of the CNMI's labor market as shown below:

**Chart 3.c Mean Hourly Wage by Major Industry:
2021 PWS, CNMI**



iii. Education and Skill Levels of the Workforce

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

The 2021 Citizen Centric Report of the CNMI's Public School System (PSS) reported 695 students throughout the CNMI graduated with a high school diploma in school year 2020-2021 or 88% that graduated within four years. A survey that was recently completed by the graduating class indicated educational and/or employment aspirations immediately after graduation in the following:

- 23.1% pursue a 2-year College
- 19.2% pursue 4-year college
- 3.8% pursue Trade School
- 11.5% pursue Military
- 38.4% to enter the workforce full-time/part-time
- 3.8% pursue Apprenticeship

Data from the CNMI's Northern Marianas College (NMC) reported in their 2021 Citizen Centric Report an increase in enrollment in 2021 of 1,460 students as compared to 1,323 in 2020. Between academic year 2011-12 to 2020-21, there were 2,085 individuals awarded degrees and certificates. A total of 252 were awarded alone in academic year 2020-21 in the following:

- 19 BS in Education
- 22 BS in Business Management

- 17 AA in Business
- 88 AA in Liberal Arts
- 41 AAS in Business Administration
- 14 AAS in Criminal Justice
- 10 AAS in Hospitality Management
- 1 AS in Fire Science Technology
- 9 AS in Natural Resource Management
- 21 AS in Nursing
- 10 Certificate of Completion as Nurse Assistant

Since the reopening of the Northern Marianas Technical Institute (NMTech) in 2021, a total of 84 individuals enrolled in the Fall of 2021 as reported in their 2021 Citizen Centric Report. NMTech offers programs in Construction Technology, Welding, Electrical, Electronic System Technician, HVAC, Power Generation Maintenance Electrician, Carpentry, Masonry, heavy Equipment Operations, Culinary Arts, Automotive, and Power Generation Maintenance Mechanic.

iv. Skill Gaps

Describe apparent 'skill gaps'.

For many years, the skills demand of the CNMI's workforce were filled with foreign workers under the CW-1 program. U.S. PL 110-218 extended the program and set the statutes to eventually phase out the program in 2030. In the 2021 Prevailing Wage Survey (2021 PWS), sixty-five percent of all employees surveyed were U.S. citizens, twenty-four percent held CW-1 visas, eight percent Green Card holders, and the remaining 3.5% reported as other. The skills gaps of the CNMI's workforce are the occupations held by the twenty-four percent under the CW-1 visa program and the 3.5% reported in other visa categories.

Based on statistical data on job vacancy announcements compiled by the CNMI's Department of Labor, the skills gap were identified in the following occupational groups:

- Construction and Extraction
- Installation, Maintenance, and Repair
- Buildings and Grounds Cleaning and Maintenance
- Food Preparation and Serving Related
- Personal Care and Service

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

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

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required ⁶ and optional one-stop delivery system partners.⁷

[6] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

In hopes of restructuring the education and workforce systems of the CNMI, the island held an Education Summit to begin the process of looking at the data-sets, successes, and opportunities for the CNMI to transition both its education and workforce systems. There is a belief that workforce education and skills gap reductions are both critical information to designing and re-designing education and training activities. Inclusive in these workforce development activities are the blended approaches of incorporating career pathways and workforce curriculum and transition services from elementary to junior to high school to either college, trades, technical or professional credentialing programs and into the workplace through subsidized employment and/or training programs. All CNMI core program partners continue to actively participate in and network their greater and common efforts towards developing the CNMI's workforce skills and talents.

The CNMI State Workforce Development Board has restructured its committees and adopted new policies to implement, monitor, and review the activities funded through WIOA and other existing or future workforce funding assigned to them. The leadership provided by the SWDB provides for a great combination of private, government, and education service providers perspective, knowledge and expertise to make an impact to the workforce development system.

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

The CNMI's core workforce partner programs continue to be complementary of each other and promote each other's functions and services. The core programs work closely together and increase collaborative opportunities to work towards improving access to, providing, and delivery of workforce development activities. Program partners sit on each other's councils, boards or advisory committees, they work together and collaborate on the planning and review processes as all three partners worked together to ensure that the plan was completed in a timely manner, had public input, and was approved by the SWDB, all while sharing limited

resources. Resource mapping and understanding key roles, vision, objectives of each core entity is also vital to the collaborative efforts of the team.

Core partners also work together to better serve common clientele or participants through the adoption of the online portal www.hiremarianas.com which serves as an online one-stop intake and referral process. The Northern Marianas College Adult Basic Education Program (NMC-ABE) and the CNMI Department of Labor Workforce Investment Agency (DOL WIA) developed an added intake and referral process for those individuals who seek services from either entity. Individuals seeking assistance who do not have a high school diploma or equivalent or lack work search skills will be served by DOL WIA through the intake process then referred from DOL WIA to NMC ABE to be assessed for services or provided workforce skill development courses. A similar process takes place with the CNMI Office of Vocational Rehabilitation in which those in need of rehabilitation services, DOL WIA or NMC ABE would conduct the intake process and then refer such individual to the Office of Vocational Rehabilitation (and vice-versa). OVR then helps to prepare individuals with disabilities for competitive integrated employment through an array of VR services including training or educational services consistent with and provided in the context of an approved individualized plan for employment (IPE) and as needed makes the proper referrals to the appropriate entities. Another collaborative opportunity occurs between DOL WIA and the Apprenticeship State Expansion Grant to create and implement a U.S. Department of Labor Registered Apprenticeship Program for incumbent employees.

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

Strengths:

- Strong understanding of, respect for, collaboration and partnership amongst the core programs and services amongst each partner;
- Leveraging of both local and federal resources to achieve common goals, objectives or strategies;
- Increased desire to achieve an educated and skilled CNMI workforce;
- Improved availability and access to education and training providers to fill more of the identified gaps and skill shortages;
- Increased or renewed interests in private business sectors in U.S. eligible workers;
- Increased abilities to service participants at intake and share demographic information as well as provide referrals to each appropriate entity;
- Education and training providers have increased access to curriculum and degree or certificate plans to provide appropriate credentials to those in need of available curricula;
- Collaboration with disability support services and participation in outreach activities have increase awareness of workforce development activities amongst such audiences;
- Education and training providers provide flexible schedules or alternative learning platforms for individuals to maximize learning;
- Increased awareness and access to intensive and/or supportive services for participants;

- Participants now have access to more education and training providers through expanded ETPLs;
- Work experience programs are designed with training plans which measure a participants progress and outcomes in hopes of meeting the intent of WIOA;
- Increased access to USDOL Registered Apprenticeship opportunities for incumbent workers;
- Increased access to Virtual Online (One-Stop) System.

Weaknesses:

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

- Limited training providers in the CNMI especially in the neighboring islands of Tinian and Rota.
- Training providers need training on how to effectively work with clients with different types of disabilities.
- The paperwork and reporting requirements asked of employers that either hire or provide work experience opportunities for OVR clients was described as burdensome and time consuming.

C. STATE WORKFORCE

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

The CNMI State Workforce Development Board is composed of individuals from both the private and public sectors with experience, know-how, and authority to make decisions of their respective entities workforce. The SWDB members understand what their respective companies workforce needs to be competitive. The SWDB has a program committee and other committees that allow for sub-committees which can be populated by subject matter experts to help set the direction of programs and services offered to best meet the workforce needs. Additionally, the increased involvement of a private sector led State Workforce Development Board membership in carrying out the necessary workforce development activities provides the leadership and professional guidance to the State workforce entities in the delivery of effective workforce development strategies for an educated, skilled, and competitive CNMI workforce system and human capital successful employment outcomes.

The experience and knowledge of the administrators/leaders within the CNMI Department of Labor and DOL WIA, along with the respective experience of the teams they oversee, the CNMI has the commitment and capacity necessary to carry out the WIOA Title I workforce development activities. In addition, the Core partners have the appropriate experienced teams that help with the implementation and execution of programs and services. As needed, the CNMI will restructure and invest in its team to help improve the reporting of both program and financial matters as well as delivery of programs and services. The NMC ABE program has proven leadership and team to execute its given mandates. Although resources have been reduced, the team continues to provide quality service which leads to improved outcomes. CNMI OVR, given their current resources, has adequate capacity to provide for their workforce development activities (e.g. educational and training activities) through the maximization of available comparable services and benefits allowed as well as the utilization of cost-sharing strategies with WIOA Core Program Partners as appropriate. In addition, the strong collaboration and partnership between state workforce programs are firmly established with the understanding, focus, and commitment in the transformation and development of the CNMIs workforce development activities. Leveraging, sharing of critical information of participants served for the delivery of essential and holistic workforce development services is well established and open while also ensuring that the confidentiality of the population served are protected.

B. STATE STRATEGIC VISION AND GOALS

II. b. State Strategic Vision and Goals

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

- **1. Vision** Describe the State's strategic vision for its workforce development system.

It is the vision of the CNMI's State Workforce Development Board:

"To integrate a seamless workforce development system that meets the needs of employers, job-seekers, workers, and youths in order to supply quality employees for the dynamic economy of the CNMI."

The CNMI's State Workforce Development Board mission remains unchanged and is:

"Empowering, integrating, implementing, and innovating the workforce needs of the CNMI."

- **2. Goals** Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment⁸ and other populations.⁹(B) Goals for meeting the skilled workforce needs of employers.

[8] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

Goal 1: Strengthen the collaboration of the workforce development system for the expansion of a comprehensive, integrated, effective, and streamlined service delivery system.

Goal 2: Enhance Business Service strategies to increase strategic partnerships and engagement to develop customized services that aligns with the present-day economy across programs of the workforce development system.

Goal 3: Integrate an innovative customer-centered service delivery model focused on the customer's job-driven occupational and training needs that includes enhanced supportive services to address barriers that may impede participation.

Goal 4: Increase the skills of jobseekers for high-quality jobs and careers in demand-driven industries that align with the workforce needs of employers that lead to employment, reemployment, and retention.

Goal 5: Empower the SWDB and State Workforce Agency through professional development or other training needs in order to adequately engage with and support participants, employers, and other service providers' workforce needs.

- **3. Performance Goals** Using the tables provided within each Core Program section, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)
- The WIOA Core Programs (Title I, Title II, and Title IV) reviewed their Performance Goals and propose the Performance Measures found in the photo below. Each program

describes its respective Expected and proposed Negotiated Rates for Program Years 2020 and 2021.

II.b.(3) Performance Goals Titles I, II, and IV					
Program	Performance Measure	Program Year 2020-2021		Program Year 2022	Program Year 2023
		Negotiated Level		Proposed Level	Proposed Level
Title I Youth	Education, Training, or Employment (2 nd Quarter after Exit)	50.0%		50.0%	50.0%
Title I Adult & Dislocated Worker		50.0%		50.0%	50.0%
Title II Adult Basic Education		2020	2021	57.0%	58.0%
Title IV Office of Vocational Rehabilitation		55.0%	57.0%		
	Employment (2 nd Quarter after Exit)	Baseline		50.0%	50.0%
Title I Youth	Education, Training, or Employment (4 th Quarter after Exit)	50.0%		50.0%	50.0%
Title I Adult & Dislocated Worker		50.0%		50.0%	50.0%
Title II Adult Basic Education		2020	2021	60.0%	61.0%
Title IV Office of Vocational Rehabilitation		58.0%	60.0%		
	Employment (4 th Quarter after Exit)	Baseline		Baseline	Baseline
Title I Adult & Dislocated Worker	Median Earnings (2 nd Quarter after Exit)	\$3,200		\$3,200	\$3,200
Title I Youth		\$3,000		\$3,000	\$3,000
Title II Adult Basic Education		\$4,153		\$4,153	\$4,153
Title IV Office of Vocational Rehabilitation		Baseline		Baseline	Baseline
Title I Adult & Dislocated Worker	Credential Attainment Rate	66.5%		66.5%	66.5%
Title I Youth		66.0%		66.0%	66.0%
Title II Adult Basic Education		2020	2021	81.0%	82.0%
Title IV Office of Vocational Rehabilitation		89.0%	81.0%		
	Measurable Skill Gains	Baseline		Baseline	Baseline
Title I Adult & Dislocated Worker	Measurable Skill Gains	50.0%		50.0%	50.0%
Title I Youth		50.0%		50.0%	50.0%
Title II Adult Basic Education		45.0%		50.0%	51.0%
Title IV Office of Vocational Rehabilitation		Baseline		Baseline	Baseline

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

The CNMI SWDB created a committee to conduct assessment and review of programs and services offered by WIOA Core Partners. They will be provided with the USDOL Grants Core Monitoring Guide to serve as the lead model for assessment and review. The SWDB will also incorporate the Plan, Do, Check, Adjust, and Act (PDCAA) model for ongoing continuous improvement.

The SWDB and DOL WIOA Team along with contractual entities will work what is called in the Plan, Do, Check, Adjust, and Act (PDCAA) functions of the Continuous Quality Improvement Cycle. Through the State Plan, the following will occur:

- Plan: The SWDB created a committee to develop the State Plan will be the source of the planning process and guides for the SWDB and DOL WIOA Team in the direction, goals and strategies of the SWDB.
- Do: The DOL WIOA Team is responsible for the implementation of the operational plan which will help execute the specific functions needed towards meeting the SWDB's Goals and Vision.
- Check: The SWDB Committee and sub-committees will work on data collection via client satisfaction surveys, performance evaluations and/or a combination of both will be

gathered and used to measure how well the programs and services offered are meeting the prescribed performance goals identified. The information generated from these tools will help the administration to better understand its position and make continuous quality improvement decisions to help the CNMI meet its workforce vision and goals.

- **Adjust:** The information generated from these tools will help the administration to better understand its position and make continuous quality improvement decisions to help the CNMI meet its workforce vision and goals. As we review the outcomes and performance ratings, we will make needed adjustments to either strategies or implementation techniques in order to meet our performance goals.
- **Act:** The appropriate actions as needed will be made to ensure that the Core Programs and Services meet performance measures. The CNMI is held to certain agreed upon performance standards.

The outcome of its workforce development delivery system evaluations are considered paramount in the planning of the CNMIs current and future education, employment, and economic prosperity. Proper development of the tools and human resources needed to adequately track and analyze data is also critical to the assessment of programs and services. The CNMI core partners will work with the SWDB Committee to develop a work group to go through performance and data. This group will meet regularly to ensure that the data collected is assessed and will be compared against the baseline set to measure the effectiveness of the CNMI's workforce delivery system and will then report to the SWDB as needed. The agreed upon performance standards will be the primary areas for review, followed by satisfaction of services received from the Core Programs, Client satisfaction of performance performed by participants, Participant satisfaction of work place, work experience, education and/or training environment and learning opportunities. Other factors may be created to better meet the vision and goals.

C. STATE STRATEGY

The CNMI has chosen to continue focusing on the following Seven Evidence-Based Strategies that have been shown to work, helping ensure effective delivery of services, and increasing the likelihood that those who receive services obtain gainful employment:

Leadership Development Strategy:

The lack of confidence, resiliency, and leadership abilities amongst participants has lead the SWDB to focus on developing leadership abilities of its participants inclusive of the following:

- Youth Leadership Development Curriculum and Training;
- Adult/DW Leadership Development Curriculum and Training.

Career Pathway Strategy (Career Ladders or Career Lattices):

The CNMI Core Programs are working closely with Education and Training providers to promote and recommend clients to participate in Career Pathway types of programs.

- Designed to identify a series of positions, work experiences or educational benchmarks or credentials that offer occupational advancement opportunities for clients to facilitate incremental and progressive skill attainment over time, in clearly segmented blocks, which are flexible, and can be module based, staggered learning, or other form of articulated system.

- Curriculum design to integrate from K-12 and introduce workforce careers into elementary to middle school to high school and beyond will also be identified. A model program for the hotel and tourism industry is called the My W.A.V.E. program also known as the Marianas Youth Welcome All Visitors Enthusiastically Program, which could be linked to the American Hotel and Lodging Educational Institute's S.T.A.R.T. program offered in high schools and trades schools which would could eventually lead to an undergraduate certificate in Business Administration with an Emphasis in Tourism and Hospitality Management.
- All segments focusing on certain industry positions as time progresses and skills/knowledge/experiences are gained.

Industry Participation Strategy:

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

- USDOL Registered Apprenticeships for Incumbent Workers;
- Public Safety/Law Enforcement/Health Academies;
- AHLEI Certification for Hotel and Restaurant Operations;
- A HANMI recognized curriculum for Culinary Arts;
- CISCO Networking Certifications for the Information Technology;
- Bookkeeping and/or Accounting Credentials;
- NCCER Certification for Construction Trades/Technology;
- Identify Resource Gaps inclusive of monetary, institutional, labor, skills, etc.

Learn and Earn Strategy and Customized Training Strategy:

Designed to facilitate training plans that lead to skills attainment while also providing compensated work experiences.

- Pre-Apprenticeships leading towards an Apprenticeship Opportunity;
- Registered Apprenticeship Opportunities are being held in Collaboration with the USDOL Office of Apprenticeship;
- Incumbent Worker Training;
- On-the-Job Training;
- Work Experience Programs;
- Ensuring competitive integrated employment opportunities by matching employers with skilled and talented workers including individuals and youth with disabilities.

Building Data Capacity Strategy:

- Data will guide the design, assessment and evaluation of programs;
- Diagnostic Data;
- Performance Data;
- Research Studies;

- Measurement of Skill Attainment;
- Inventory

Integrating, Mapping, and Aligning Services Strategy:

- Integrating service delivery and mapping resources better align services and goals to achieve common outcomes across the CNMI's workforce, education, and employers;
- SWDB and CNMI core partners as well as other key service providers will collaborate in designing effective policies to ensure that those in most need in the community are provided opportunities to participate in educational and training programs supporting their entry or transition in the workforce. Additional strategies to address the needs of the population will include:
 - **Accessibility:** Workforce core partners will work to identify and reduce barriers to employment for all residents. Policies and procedures will be developed and implemented to ensure employment access for all CNMI residents;
 - **Key Stakeholders;** Core partners and employers will collaborate to develop programs and initiative to increase opportunities for CNMI residents to gain the skills, credentials, and experience needed to get a job and to sustain employment, reduce the skills gap between the employers and the workforce. Recognizing and identifying the CNMI employers' education, training, and workforce needs will be set as priorities;
 - **Career Pathways:** Core partners will strengthen the career pathways process by improving the delivery and transitional navigation into the workforce. Career pathways will provide the CNMI workforce with the skills, education, work-based training opportunities, resources, support, and accommodations needed to gain employment.

Integrated Education And Training Strategy:

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

III. OPERATIONAL PLANNING ELEMENTS

A. STATE STRATEGY IMPLEMENTATION

1. STATE BOARD FUNCTIONS

III. a. 1. State Board Functions

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

Consistent with the requirements of a state workforce development board outlined in section 101(d) of WIOA, the CNMI's State Workforce Development Board has adopted its by-laws outlining the functions as the designated entity to act on behalf of the Governor. The CNMI's State Workforce Development Board functions are described in Article I, section C. of the By-Law as follows:

- a.) Development, implementation, and modification of the 4-year State Plan;
- b.) Review of statewide policies, programs, and recommendations on actions that must be taken by the State to align workforce development programs to support a comprehensive and streamlined workforce development system. Such review of policies, programs, and recommendations must include a review and provision of comments on the State Plans, if any, for programs and activities of one-stop partners that are not core programs;
- c.) Development and continuous improvement of the workforce development system, including—
- d.) Identification of barriers and means for removing barriers to better coordinate, align, and avoid duplication among programs and activities;
 - 1. Development of strategies to support career pathways for the purpose of providing individuals, including low skilled adults, youth, and individuals with barriers to employment, including individuals with disabilities, with workforce investment activities, education, and supportive services to enter or retain employment;
 - 2. Development of strategies to provide effective outreach to and improved access for individuals and employers who could benefit from workforce development system;
 - 3. Development and expansion of strategies to meet the needs of employers, workers, and job seekers particularly through industry or sector partnerships related to in-demand industry sectors and occupations;
 - 4. Identification of regions, including planning regions for the purposes of WIOA sec. 106(a), and the designation of local areas under WIOA sec. 106, after consultation with Local SWDBs and chief elected officials; \
 - 5. Development and continuous improvement of the one-stop delivery system in local areas, including providing assistance to Local SWDBs, one-stop operators, one-stop partners, and providers. Such assistance includes assistance with planning and delivering services, including training and supportive services, to support effective delivery of services to workers, job seekers, and employers; and
 - 6. Development of strategies to support staff training and awareness across the workforce development system and its programs;
 - 7. Development and updating of comprehensive State performance and accountability measures to assess core program effectiveness under WIOA sec. 116(b);
- e.) Identification and dissemination of information on best practices, including best practices for:
 - 1. The effective operation of one-stop centers, relating to the use of business outreach, partnerships, and service delivery strategies, including strategies for serving individuals with barriers to employment;
 - 2. The development of effective Single State Workforce Development Board, which may include information on factors that contribute to enabling Local areas to exceed negotiated local levels of performance, sustain fiscal integrity, and achieve other measures of effectiveness; and
 - 3. Effective training programs that respond to real-time labor market analysis, that effectively use direct assessment and prior learning assessment to measure an individual's prior knowledge, skills, competencies, and experiences for adaptability, to support efficient placement into employment or career pathways;

f.) Development and review of statewide policies affecting the coordinated provision of services through the State's one-stop delivery system described in WIOA sec. 121(e), including the development of:

1. Objective criteria and procedures for use by Single State Workforce Development Board in assessing the effectiveness, physical and programmatic accessibility and continuous improvement of one-stop centers. Where a Single State Workforce Development Board serves as the one-stop operator, the SWDB must use such criteria to assess and certify the one-stop center;
2. Guidance for the allocation of one-stop center infrastructure funds under WIOA sec. 121(h); and (3) Policies relating to the appropriate roles and contributions of entities carrying out one-stop partner programs within the one-stop delivery system, including approaches to facilitating equitable and efficient cost allocation in the system; and
3. Policies relating to the appropriate roles and contributions of entities carrying out one-stop partner programs within the one-stop delivery system, including approaches to facilitating equitable and efficient cost allocation in the system.

g.) Development of strategies for technological improvements to facilitate access to, and improve the quality of services and activities provided through the one-stop delivery system, including such improvements to:

1. Enhance digital literacy skills (as defined in sec. 202 of the Museum and Library Service Act, 20 U.S.C. 9101);
2. Accelerate acquisition of skills and recognized postsecondary credentials by participants;
3. Strengthen professional development of providers and workforce professionals; and
4. Ensure technology is accessible to individuals with disabilities and individuals residing in remote areas;

h.) Development of strategies for aligning technology and data systems across one-stop partner programs to enhance service delivery and improve efficiencies in reporting on performance accountability measures, including design implementation of common intake, data collection, case management information, and performance accountability measurement and reporting processes and the incorporation of local input into such design and implementation to improve coordination of services across one-stop partner programs;

i.) Development of allocation formulas for the distribution of funds for employment and training activities for adults and youth workforce investment activities, to local areas as permitted under WIOA secs. 128(b)(3) and 133(b)(3);

j.) Preparation of the annual reports described in paragraphs (1) and (2) of WIOA sec. 116(d);

k.) Development of the statewide workforce and labor market information system described in sec. 15(e) of the Wagner-Peyser Act; and

l.) Development of other policies as may promote statewide objectives for and enhance the performance of the workforce development system in the State.

In addition, committees were established to delineate responsibilities and to effectively carry out the functions of the board as required in the WIOA. The CNMI's State Workforce Development Board established the following committees and responsibilities:

1. Executive Committee

The Executive committee of the SWDB shall be composed of SWDB Chairperson, Vice-Chairperson, and Secretary/Treasurer. DOL-WIA Division WIOA Director and other key personnel shall attend meetings at the request of the Executive Committee, but shall not be a voting member.

During the interval between SWDB meetings, the members of the Executive Committee shall manage the activities and affairs of the SWDB.

1. The Executive Committee may, at the recommendation of the Chair or any other SWDB member, appoint or remove standing committee Chairs and members.
2. The Executive Committee shall hold meetings at the request of the Chair of the SWDB. The Chair of the SWDB shall also serve as Chair of the Executive Committee. A majority of the voting members of the Executive Committee shall constitute a quorum.
3. The Executive Committee shall review the Bylaws annually and may suggest amendments to the SWDB. It may also review Bylaws amendments proposed by other members in order to make recommendations on such amendments to the SWDB.
4. The Executive Committee shall routinely review member attendance at SWDB and Committee meetings.
5. The Executive Committee shall recommend potential board members to the Governor and shall see to it that orientation and training is provided for new board members, that retreats and other social events of the board take place, that board evaluations are developed and conducted and that improvements are made to the Four-Year Unified State Plan.
6. The Executive Committee may take action on behalf of the full SWDB when such action must be taken prior to the next full meeting of the SWDB.

2. Policies and Procedures Committee:

The Policy and Procedures Committee shall review and recommend for adoption the statutory policies of the SWDB and operational procedures of DOL-WIA Division to ensure program services complies with the mandates of the Workforce Innovation and Opportunity Act hereinafter referred to as WIOA.

3. Program Committee:

The Program Committee provides leadership in the review of all DOL WIOA program applications for WIOA funding and makes recommendations to the SWDB and DOL WIA on the development, approval/denial, tracking, monitoring, continuance or discontinuance of the program, service providers, and services offered by DOL-WIA Division to ensure program services complies with the mandates of WIOA. The committee will also distinguish which programs and services will be done State-wide or specific to local areas.

4. Planning, Assessment, Evaluation, and Research Committee:

The Planning, Assessment, Evaluation, and Research Committee coordinates the strategic planning process, review of economic conditions, and trends to include existing industry sectors and occupations where there is an existing demand, provide analysis of the SWDB's workforce development activities to address the education and skills gaps needed in the workforce. In striving for continuous quality improvement the committee will coordinate the assessment and evaluation processes of the programs and services offered by DOL WIA and the SWDB and recommend to board the areas for improvement or continuation. The committee will also review and recommend research project activities to conduct studies in hopes of improving the workforce and/or economic conditions of the CNMI.

5. Grievance Committee: (Executive Committee and as needed)

The Grievance Committee will review claims, issues, complaints, and/or protests specific to the SWDB Board Policies, DOL WIA Procedures, and/or decisions by the SWDB and/or DOL WIA Management on the approval or denial of programs and/or services offered to service providers, participants, and or partners. The Grievance Committee will make recommendations to the Executive Committee. If warranted the Executive Committee will then assign the recommendations to the appropriate committee, the full SWDB, DOL WIA or appropriate entity for action.

2. IMPLEMENTATION OF STATE STRATEGY

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

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

In addition to meeting each respective Core Program's mandates, the CNMI's three Core Programs have agreed to work closely together to focus on serving the needs of WIOA qualified consumer/participant/students through the following:

- Registration and Intake of consumer/participant/students using both a manual and the Virtual Online One-Stop System (VOS) as soon as access and training is completed among all three programs; This will also help with an individual that would need to be co-enrolled for various services, i.e. the intake/registration process identifies a high school drop out who would need the services of multiple Core Program services;
- Inform and Refer consumer/participants/students to the appropriate Core Program so that the such individual would receive the appropriate services at either their expected level of entry, competence, ability, or need;
- Participate in the State Wide Leadership Development Strategies targeted at Youth, Adults, and Dislocated Workers;
- Participate in the State Workforce Development Board Committees such as the Program Committee to ensure that programs and services provided by each entity do not overlap and that maximum resources are made available to the individual or entity;
- Continue to collaborate and honor the intent of the Memorandum of Understanding (MOU) signed by the three partners;
- Collaborate to collect and share data through either the VOS or as agreed upon Core Program's MOU;
- Collaborate in program review, evaluation, assessment, and performance training and technical assistance;
- Collaborate to leverage funding resources for qualified OJT, WEP/T, Pre ETS, Career Readiness, Adult Education Services needed for each participant and eliminate the

burden of one entity carrying the expense for such services, as well as providing an opportunity for the individual to avail of all possible services available to her/him.

Although each respective core program have identified the activities/strategies that would occur through their entities, the CNMI Title I Program has chosen to continue focusing on the following Seven Evidence-Based Strategies that have been shown to work, helping ensure effective delivery of services, and increasing the likelihood that those who receive services obtain gainful employment:

Leadership Development Strategy:

The lack of confidence, resiliency, and leadership abilities among participants has lead the SWDB to focus on developing leadership abilities of its participants inclusive of the following:

- Youth Leadership Development Curriculum and Training;
- Adult/DW Leadership Development Curriculum and Training.

Career Pathway Strategy (Career Ladders or Career Lattices):

The CNMI Core Programs are working closely with Education and Training providers to promote and recommend clients to participate in Career Pathway types of programs.

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

Industry Participation Strategy:

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

- USDOL Registered Apprenticeships for Incumbent Workers;
- Public Safety/Law Enforcement/Health Academies;
- AHLEI Certification for Hotel and Restaurant Operations;
- A HANMI recognized curriculum for Culinary Arts;
- CISCO Networking Certifications for the Information Technology;
- Bookkeeping and/or Accounting Credentials;
- NCCER Certification for Construction Trades/Technology;
- Identify Resource Gaps inclusive of monetary, institutional, labor, skills, etc.

Learn and Earn Strategy and Customized Training Strategy:

Designed to facilitate training plans that lead to skills attainment while also providing compensated work experiences.

- Pre-Apprenticeships leading towards an Apprenticeship Opportunity;
- Registered Apprenticeship Opportunities are being held in Collaboration with the USDOL Office of Apprenticeship;
- Incumbent Worker Training;
- On-the-Job Training;
- Work Experience Programs;
- Ensuring competitive integrated employment opportunities by matching employers with skilled and talented workers including individuals and youth with disabilities.

Building Data Capacity Strategy:

- Data will guide the design, assessment and evaluation of programs;
- Diagnostic Data;
- Performance Data;
- Research Studies;
- Measurement of Skill Attainment;
- Inventory

Integrating, Mapping, and Aligning Services Strategy:

- Integrating service delivery and mapping resources better align services and goals to achieve common outcomes across the CNMI's workforce, education, and employers;
- SWDB and CNMI core partners as well as other key service providers will collaborate in designing effective policies to ensure that those in most need in the community are provided opportunities to participate in educational and training programs supporting their entry or transition in the workforce. Additional strategies to address the needs of the population will include:
 - **Accessibility:** Workforce core partners will work to identify and reduce barriers to employment for all residents. Policies and procedures will be developed and implemented to ensure employment access for all CNMI residents;
 - **Key Stakeholders:** Core partners and employers will collaborate to develop programs and initiative to increase opportunities for CNMI residents to gain the skills, credentials, and experience needed to get a job and to sustain employment, reduce the skills gap between the employers and the workforce. Recognizing and identifying the CNMI employers' education, training, and workforce needs will be set as priorities;
 - **Career Pathways:** Core partners will strengthen the career pathways process by improving the delivery and transitional navigation into the workforce. Career pathways will provide the CNMI workforce with the skills, education, work-based training opportunities, resources, support, and accommodations needed to gain employment.

Integrated Education And Training Strategy:

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

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

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

The activities of the CNMI's workforce development system are not limited to core or other partners prescribed in the WIOA. Design and development of activities occurs on a continuum to align, coordinate, reduce duplication, and maximize resources to address barriers to employment and the needs of employers.

Existing collaborative partnerships exists with the following entities:

- **CNMI Public School System**

- o Career Technical Education (PSS CTE)

An interagency partnership with postsecondary and workforce partners to build career pathways and prepare in-school youths to be college and career ready

- o Cooperative Education Program (Co-Op)

An integrated internship program that provides in-school youths career exploration opportunities, job shadowing, leadership development, work experiences, occupational skills training, etc.

- o Special Education Program (SPED)

Cross-agency partnerships to coordinate pre-employment and other transition services for students with disabilities.

- **CNMI Registered Apprenticeship Partners**

An interagency workgroup that consists of the CNMI's local education agencies (college and vocational institutions), WIOA Core Partners (Titles I, II, IV), registered apprenticeship sponsors (employers), to increase the talent pipelines of incumbent workers and expand opportunities through apprenticeship.

- **CNMI Methamphetamine and Opioid Initiative Consortium (CMOI)**

A consortium of community partners to address issues of substance use disorders in the community that aims to reduce recidivisms and promote efforts in prevention, treatment, and recovery.

- **CNMI Disability Network Partners (DNP)**

A network of state entities that promote and support an all-inclusive accessible community that reduces barriers and continuous improvements in the service delivery systems to support individuals with disabilities.

• **Public-Private Partnerships**

Occurring on a continuum to support design and development of workforce development strategies or opportunities for businesses and jobseekers, that include adults with low-literacy skills, youths, and individuals with disabilities, to enter into a career pathway in high-demand sectors and occupations.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

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

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

The responsibilities of each partner are to:

- Coordinate services among partners in the one-stop system to assure seamless delivery of services;
- Placement or assignment of personnel within their designated one-stop delivery system area or virtual online process;
- Use of the single case management system identified to address the following:
- Common registration throughout the partner area WIOA Core Programs

Implementation of a robust on-line service delivery hub that integrates information and on-line services across core programs;

- Implement data integration strategies that support the ability for front-line staff and counselors better assist clients;
- Assure performance standards, measures and objectives applicable to each partner such as:
 - Improved service delivery and employment outcomes;
 - More effective connections to all available services through integrated case management;

- Increased accessibility to services through automation and self-service
- To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.

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

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

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

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

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

employer services are also available and can be conducted by the case management or administrative teams.

In addition, the CNMIs economy is primarily the hospitality industry with large association memberships such as HANMI and the Chamber of Commerce membership association. The CNMI understands along with a private sector driven SWDB that providing the highest level of quality and efficient services to employers can only bring successful and tangible outcome oriented results. The development and investment in the CNMIs human capital feeds into the private sector economy where employers provide the employment and training opportunities. Engaging in improved employer relations across core and non-core programs is not an option to be considered but rather the "must do" approach in order to achieve and succeed with the execution of the CNMIs workforce development initiatives and transformation efforts. The CNMIs economy depends on the successes of the private/employer sectors hence the need to ensure that all programs core or non-core are responsive to, actively participates in collaboration, partnerships, and leveraging of programs and services benefitting the CNMIs economy of employers.

The achievement of this approach can be accomplished through

- Coordination and partnership of all core programs in the service delivery approach to employers;
- Development of a comprehensive and unified programs and services information and outreach materials specifically targeted for employers;
- Promotion and development of a strong business relationship with employers that can assess their current and future workforce development and needs;
- Encouraging the active engagement of employers through the CNMI State Workforce Development Board private sector membership;
- Improvement on information sharing to employers on workforce partnership benefits;
- Production of the workforce talent that is responsive to employer's workforce needs whether short or long term ;
- Engage in research activities aimed to help stimulate the economy and diversify the workforce in consideration of the size of our community and abilities/preparation of our participant;
- Engagement of the Higher Education Institution(s) and training providers in acquiring labor market intelligence for the design and development of employer's current and future workforce needs

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

Eligible Training Provider List (ETPL) process and a formal registration system has been implemented for educational institutions will also be implemented as a part of the Virtual Online System/Virtual One-Stop System created by Geographical Solutions. These services can also be done via self-service or in-person. An orientation to the requirements and expectations will also be conducted. The SWDB has adopted policies reflecting these updates.

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

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

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

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

Other education and training providers are engaging in the ETPL process as well as Virtual Online System to establish/register themselves to receive support and services from WIOA.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

Eligible Training Provider List (ETPL) process and a formal registration system has been implemented for educational institutions will also be implemented as a part of the Virtual Online System/Virtual One-Stop System created by Geographical Solutions. These services can also be done via self-service or in-person. An orientation to the requirements and expectations will also be conducted. The SWDB has adopted policies reflecting these updates.

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

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

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

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

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

CNMI Governor Ralph DLG. Torres and his administration as well as the CNMI Legislature all continue to work to allocate and appropriate funding to ensure that qualified CNMI residents to avail of financial aid opportunities from the CNMI Scholarship Program. In addition, it has been a practice for each island municipality's Mayor or Political leaders to set aside funding for its qualified residents to avail of municipal scholarship (upon availability of funds). On Saipan, there is the Saipan Higher Education Financial Assistance (SHEFA) program is specific to Saipan residents, whereas Tinian and Rota also have their own respective municipal local scholarship funding. Access to federal financial aid may be available for those who qualify. The WIOA Core Programs maximizes local and federal funding to leverage the limited resource in efforts for clients to receive as much assistance as possible. However, in order to access WIOA funding, clients are asked to maximize local financial aid and scholarship funding before they access WIOA funding. Core and non-core programs with workforce related funding activities are all part of the greater effort in enhancing and improving for an increased and upward mobility and access to available CNMI workforce development programs within the CNMI providers of education and training programs.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

The CNMI's workforce development strategy to improve the skills and knowledge that offers educational advancement opportunities to meet the needs of employers and drive economic growth is achieved through career pathway programs. Collaboration with educational and training partners, industry-sector employer groups, and stakeholders for the coordination of resources to support career pathway strategies remains ongoing.

Strategies for the continuous improvements for access to post-secondary credentials include the following:

1. Eligible Training Provider List (ETP/ETPL)

Occupational skills training in an approved training program for in-demand occupations that lead to industry-recognized credentials. This includes programs in Automotive Technology; Business; Construction Trades; Culinary Arts; Healthcare; Hospitality; Power Generation, and more. The SWDB continuous efforts to provide an array of programs is determined by the labor market demands.

2. Registered Apprenticeship (RA)

A recipient of USDOL 2019 Apprenticeship State Expansion (ASE) discretionary award to create career pathways for incumbent workers in targeted industries such as Construction and maintenance, Hospitality, Food Services, Allied Health and Safety, and Management and Accounting. The "earn and learn" requires related training instructions (RTI) and on-the-job learning (OJL) that leads to nationally recognized credential issued by the US Department of Labor Office of Apprenticeship.

3. Career Technical Education Summer Boot Camp

Occupation specific training program that combines coursework requirements with work-based learning opportunities to prepare for entry into post-secondary education or registered apprenticeship programs.

4. ABE Workplace Success Training

Soft skills training to improve overall workplace success of participants that includes topics such as: O'Net Career Exploration & Career Planning, Workings with Others & Meeting Workplace Expectations, Getting Ahead & Resume Building, Managing Yourself & Interview Etiquette.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

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

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

B. STATE OPERATING SYSTEMS AND POLICIES

The CNMI's workforce development system is working towards integrating its data infrastructure that align to meet the needs of each program.

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

The CNMI is negotiating terms to secure an independent license agreement of a statewide operating system for the core programs.

The CNMI Core Programs have agreed to continue the efforts of transitioning from its current respective data systems to the Virtual Online/Virtual One-Stop System called HireMarianas. HireMarianas is an electronic data warehouse that collects, stores, and analyzes all information entered into the system. The VOS provides a fully-integrated report design compliant with state and federal requirements inclusive of the Participant Individual Record Layout (PIRL) requirement established by US DOL-ETA. The first program to fully implement the VOS system for data collection and reporting processes is the Title I Program. Due to delays in the roll out and implementation of the VOS among the three core partners and various disasters, the Title II and Title IV programs were delayed in being trained to use the VOS system as well as upload any data needed to populate the system in order to obtain information needed. Both Title II and IV programs continue to use their respective reporting systems such as TopsPro from CASAS and the locally built software system developed by Software Specialties designed to capture all required RSA-911 data elements of the Title IV program. Upon completion of the needed training and increased access to the VOS portal, both Title II and Title IV intend to continue to migrate their existing processes to the HireMarianas system so that all three core programs would be able to capture and generate the information needed for collection and reporting.

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

While the CNMI has yet to co-locate required partners in a One-Stop Center, the delivery system of the one-stop partners continues to design and develop accessible, streamlined, customer focused service delivery models. The CNMI's core partners are currently reviewing its existing partnership agreement to address the requirements in the WIOA, USDOL TEGL 17-16, and other applicable guidance's.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION



TITLE I: CNMI Department of Labor Workforce Investment Agency

Consistent with WIOA, the Governor established the CNMI's State Workforce Development Board or SWDB to oversee the federal investments of the Title I programs as administered by the Department of Labor Workforce Investment Agency. As authorized by the CNMI's SWDB the Workforce Investment Agency develops and coordinates strategic workforce initiatives and activities that align with the SWDB's vision.

The Workforce Investment Agency is the sixth division of the Department of Labor.

**GOVERNOR
RALPH DLG
TORRES**

**STATE
WORKFORCE
DEVELOPMENT
BOARD**

**DEPARTMENT OF
LABOR**

**Vicky Benavente,
Secretary of Labor**

**WORKFORCE
INVESTMENT AGENCY**

**Frances A. Torres,
Director**

Program Manager

**TITLE I ADULT, DISLOCATED
WORKER, YOUTH PROGRAM**
•Federal Program Coordinator
•Job Placement Officer

**DWIG DISASTER RECOVERY
COVID-19**
•Lead Employment Development
Coordinator
•Field Operation Supervisor
•Employment Development
Assistant

**APPRENTICESHIP STATE
EXPANSION**
•Program Manager
•Program Coordinator Assistant

TITLE II: ADULT EDUCATION AND LITERACY ACT PROGRAM

The Adult Education Office is focused on meeting the educational needs of adult learners. It offers several programs to provide the educationally disadvantaged adults of the community the opportunities to acquire basic skills necessary to function more effectively and productively, to gain upward mobility, and to provide the opportunities that will prepare them to pursue further education and/or enter the workforce.

The Adult Education State Office is housed at the Northern Marianas College.

Adult Education and Literacy Organizational Chart

Office of the Governor: RALPH DELEON GUERRERO TORRES

Northern Marianas College (NMC) Board of Regents

NMC President: Galvin Deleon Guerrero, EdD

NMC Interim Dean of Academic Programs and Services: Vilma S. Reyes

Adult Education State Director: Lorraine C. Maui

Adult Education Instructors and Staff

Title IV Vocational Rehabilitation Program

The Office of Vocational Rehabilitation currently has 15 personnel that provide VR services to an estimated 300 individuals/consumers per year. OVR administrative support and services are provided by:

- o One (1) Director
- o One (1) Fiscal Officer
- o One (1) Administrative and Operations Manager
- o One (1) Office Clerk,
- o One (1) Data Analyst, and
- o One (1) Administrative Clerk.

Direct services are provided by:

- o One (1) Case Services Manager
- o Three (3) VR Counselors
- o Two (2) VR Counselor Aides,
- o One (1) Employment Specialist, and
- o One (1) ILOB Case Manager.
- o One (1) Transition Specialist

B. STATE BOARD

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

I. MEMBERSHIP ROSTER

The CNMI's State Workforce Development Board or SWDB serves as a single-state workforce board that carries out the functions of the local workforce board. The SWDB is comprised of members from both the public and private sectors with the majority of its members are representatives' of key industries in the CNMI and the balance from government and workforce representatives.

Required SWDB Members (WIOA)	CNMI State Workforce Development Board Members
The Governor or Designee (1)	Vicky Benavente , CNMI Secretary of Labor

Required SWDB Members (WIOA)	CNMI State Workforce Development Board Members
(WIOA Section 101 (b)(1)(A))	
Representatives of State Legislature (2) (WIOA Section 101 (b)(1)(B))	Senate, 22nd Commonwealth Legislature Senator Karl King-Nabors House of Representatives, 22nd Commonwealth Legislature Representative Ralph N. Yumul
Representatives of Businesses (5) (WIOA Section 101 (b)(1)(C)(i))	<ol style="list-style-type: none"> 1. Velma Palacios, SWDB Chairperson represents the Information industry. She is the Director of Network Operations & Engineering of IT&E Telecommunications company. IT&E is a member of the International Brotherhood of Electrical Workers Local Union 1357, based out of the State of Hawaii. She was the past President of the Board of Directors to the Saipan Chamber of Commerce and continues to serve as a member. Ms. Palacios is also the Chairperson for the Kagman Community Health Center 2. Nicole Babauta, Vice-Chairperson represents the Retail Trade Industry. She is the Consumer Sales Manager for Docomo Pacific. She serves as the Vice President for the Society for Human Resources CNMI Chapter and a Board Member for the Saipan Chamber of Commerce. 3. Polly Dlg Masga, Secretary/Treasurer. Ms. Masga owns Access670 Consulting and a member of the Society for Human Resource Management (SHRM) CNMI Chapter. 4. Josephine Dlg Mesta represents the Educational Services industry. She owns and operates Train*Smart providing work readiness training and job coaching services. In addition, Ms. Mesta is a member of CNMI Council on Developmental Disabilities and the Federally Qualified Health Centers. 5. Denise Montenegro, represents the Accommodation and Food Services

Required SWDB Members (WIOA)	CNMI State Workforce Development Board Members
	industry. She is the Human Resource Director at Hyatt Regency Saipan. Denise also serves as a member and Treasurer for the Society for Human Resource Management (SHRM).
Representatives of Workforce (1) (WIOA Section 101(b)(1)(C)(ii))	1. Stan Benavente is the Vice-President for Pacific BioMedical Services, Inc or PBSI. PBSI is the CNMI's first USDOL Office of Apprenticeship approved Registered Apprenticeship Program. They represent the Healthcare and Social Assistance industry. Stan also serves on the State Independent Living Council and Association for the Advancement of Medical Instrumentation (AAMI). He is a former member of the State Rehabilitation Council and a veteran of the Army National Guard.
Representatives of Government (3) (WIOA Section 101(b)(1)(C)(iii))	Title I: Frances A. Torres , WIOA Director Title II: Lorraine C. Maui , Adult Education State Director Title IV: Arlene M. Reyes , OVR Director

II. BOARD ACTIVITIES

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

Assess the current CNMI workforce development system education and training programs

Review existing state workforce policies and procedures and make the necessary changes for implementation and compliance under WIOA

Analyze CNMI labor market information to effectively implement strategies and initiatives for the transformation of the CNMIs workforce development system across the board that will address the needs of the target populations

Assess and review the current training programs and make changes or recommendations in order to align with the CNMIs demand driven sectors and occupations

Assess the current workforce service delivery design and make recommendations to the Governor for efficiency and alignment of programs and services

Review functions and services of core and non-core workforce partner programs for seamless and better leveraging of resources

Assess the needs of each municipality of the CNMI and make recommendations to the Governor and respective municipal Mayor on the transformation of a holistic CNMI workforce delivery system

Review and/or assess the delivery of programs and services that serve persons with disabilities for a better delivery of program services and program design

Assess the workforce infrastructure and make recommendations to the Governor for the creation of a CNMI universal One Stop

Assess training and developmental programs to ensure that they are current/consistent with the needs of the CNMIs employer sector and economic growth and development

Review financial matters and make recommendations

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

A. ASSESSMENT OF CORE PROGRAMS

The CNMI SWDB created a committee to conduct assessment and review of programs and services offered by WIOA Core Partners. They will be provided with the USDOL Grants Core Monitoring Guide to serve as the lead model for assessment and review. The SWDB will also incorporate the Plan, Do, Check, Adjust, and Act (PDCAA) model for ongoing continuous improvement.

The SWDB and DOL WIA Team along with contractual entities will work what is called in the Plan, Do, Check, Adjust, and Act (PDCAA) functions of the Continuous Quality Improvement Cycle. Through the State Plan, the following will occur:

- Plan: The SWDB created a committee to develop the State Plan will be the source of the planning process and guides for the SWDB and DOL WIA Team in the direction, goals and strategies of the SWDB.
- Do: The DOL WIA WIOA Team is responsible for the implementation of the operational plan which will help execute the specific functions needed towards meeting the SWDB's Goals and Vision.
- Check: The SWDB Committee and sub-committees will work on data collection via client satisfaction surveys, performance evaluations and/or a combination of both will be gathered and used to measure how well the programs and services offered are meeting the prescribed performance goals identified. The information generated from these tools will help the administration to better understand its position and make continuous quality improvement decisions to help the CNMI meet its workforce vision and goals.
- Adjust: The information generated from these tools will help the administration to better understand its position and make continuous quality improvement decisions to help the CNMI meet its workforce vision and goals. As we review the outcomes and performance ratings, we will make needed adjustments to either strategies or implementation techniques in order to meet our performance goals.
- Act: The appropriate actions as needed will be made to ensure that the Core Programs and Services meet performance measures. The CNMI is held to certain agreed upon performance standards.

The outcome of its workforce development delivery system evaluations are considered paramount in the planning of the CNMIs current and future education, employment, and economic prosperity. Proper development of the tools and human resources needed to adequately track and analyze data is also critical to the assessment of programs and services. The CNMI core partners will work with the SWDB Committee to develop a work group to go through performance and data. This group will meet regularly to ensure that the data collected is assessed and will be compared against the baseline set to measure the effectiveness of the

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

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

The CNMI has yet to migrate required programs into a One-Stop Center. Through a formal agreement or MOU, the commitment of the required partners of the one-stop delivery system to facilitate discussions to coordinate, improve, and streamline the service delivery system.

WIOA instates the performance accountability indicators to assess the effectiveness of the service delivery systems across the CNMI's core partner programs: Title I Adult, Dislocated Worker, and Youth programs; Title II Adult Education and Family Literacy Act (AEFLA) program; and the Title IV Vocational Rehabilitation (VR) program. The six (6) primary indicators of performance listed are used to measure the successes across programs:

1. Employment Rate 2nd Quarter After Exit/Title I Youth Education and Employment Rate 2nd Quarter After Exit
2. Employment Rate 4th Quarter After Exit/Title I Youth Education and Employment rate 4th Quarter After Exit
3. Median Earnings 2nd Quarter After Exit
4. Credential Attainment;
5. Measurable Skill Gains; and
6. Effectiveness in Serving Employers

In recent participation in the Evaluation Peer Learning Cohort (EvalPLC), the core partners received technical assistance and access to resources on WorkforceGPS Evaluation Hub to design other assessment tools that goes beyond performance to gauge the effectiveness of the one-stop delivery system. Strategic planning efforts are underway to identify a standardize assessment tool.

C. PREVIOUS ASSESSMENT RESULTS

As mentioned in other sections of this plan, the CNMI's WIOA core partners recently received technical assistance on the required components of an evaluation/assessment that is WIOA compliant through its alliance in the 2021 Evaluation Peer Learning Cohort (EvalPLC). The team's active involvement provided the frameworks to identify a study that goes beyond surveys and performance. Individual action plans were completed to begin assessing existing workforce strategies.

D. EVALUATION

In an effort to ensure compliance with the WIOA requirements to conduct an annual evaluation, the CNMI team comprised of the WIOA core partners (Title I, II, and IV) participated in the 2021 Evaluation Peer Learning Cohort (EvalPLC) for technical assistance on the coordination, collaboration, and development of the required WIOA research and evaluation project. The coordination amongst the team resulted in the proposed capstone project to launch an online orientation hub of the CNMI's workforce development system that will be the focus of an implementation study to examine the effectiveness of the platform in accessing the programs and services across the core partners. Other considerations for future studies include participation and co-enrollment in WIOA core programs.

The Planning, Assessment, Evaluation, & Research committee of the CNMI's State Workforce Development Board in coordination with the core programs have identified a topic area for an evaluation project. A proposed study will examine the effectiveness of work-based learning interventions within targeted populations, such as in-school youths and out-of-school youths. The request-for-proposal (RFP) is being developed to conform with federal and state requirements.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

A. FOR TITLE I PROGRAMS

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

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

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

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

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

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

B. FOR TITLE II

I. DESCRIBE HOW THE ELIGIBLE AGENCY WILL AWARD MULTI-YEAR GRANTS OR CONTRACTS ON A COMPETITIVE BASIS TO ELIGIBLE PROVIDERS IN THE STATE, INCLUDING HOW ELIGIBLE AGENCIES WILL ESTABLISH THAT ELIGIBLE PROVIDERS ARE ORGANIZATIONS OF DEMONSTRATED EFFECTIVENESS

The Adult Education Office under Subtitle C – Local Provision, Sec. 231 will make funds available for eligible agencies and these agencies shall consider the 13 considerations listed in Sec. 231 (e). The funds will be awarded to eligible providers that will provide some or all of the approved activities within the NMI region.

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

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

- Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
- Is for the purpose of educational and career advancement.

The Adult Education Office under Subtitle C- Local Provision, Sec. 231 will make funds available for eligible competing agencies and these agencies shall consider the 13 considerations listed in Sec. 231 (e).

The Adult Education Office shall award two-year grants or contracts, on a competitive basis, to eligible providers within the state to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the state. Each eligible provider receiving a grant or contract under subsection (a) use the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. Approved activities are the 8 listed in Sec. 203 of WIOA.

All applications received will be pre-screened to determine eligibility before scoring. Applications will be reviewed internally to determine that all required documents are included, as well as, documentation required to show “demonstrated effectiveness.” Applications that are incomplete, or determined to be from a provider that is not an eligible provider of “demonstrated effectiveness” will not be reviewed or scored by the review panel.

Sec.§ 463.24 (a) For the purposes of this section, an eligible provider must demonstrate past effectiveness by providing performance data on its record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services contained in the State's application for funds. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training; and (b) There are two ways in which an eligible provider may meet the requirements in paragraph (a) of this section:

(1) An eligible provider that has been funded under the Adult Education and Family Literacy Act must provide performance data to demonstrate past effectiveness.

(2) An eligible provider that has not been previously funded under the Adult Education and Family Literacy Act must provide performance data to demonstrate its past effectiveness in serving basic skills deficient eligible individuals, including evidence of its success in achieving outcomes listed in paragraph (a) of this section.

II. DESCRIBE HOW THE ELIGIBLE AGENCY WILL ENSURE DIRECT AND EQUITABLE ACCESS TO ALL ELIGIBLE PROVIDERS TO APPLY AND COMPETE FOR FUNDS AND HOW THE ELIGIBLE AGENCY WILL ENSURE THAT IT IS USING THE SAME GRANT OR CONTRACT ANNOUNCEMENT AND APPLICATION PROCEDURE FOR ALL ELIGIBLE PROVIDERS

The AEFLA funds will be awarded to eligible providers that will provide some or all of the approved activities within the NMI region. The Adult Education Office under Subtitle C – Local Provision, Sec. 231 will make funds available for eligible competing agencies and these agencies shall consider the 13 considerations listed in Sec. 231(e).

The Adult Education Office shall award two-year grants or contracts to eligible providers within the state to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the state. Each eligible provider receiving a grant or contract under subsection (a) use the grant or contract to establish or operate programs that provide adult

education and literacy activities, including programs that provide such activities concurrently. Approved activities are the 8 listed in Sec. 203 of WIOA.

All eligible providers have direct and equitable access to apply and compete for grants or contracts;

The same grant or contract announcement and application processes are used for all eligible providers in the State or outlying area; and

In awarding grants or contracts to eligible providers for adult education and literacy activities, funds shall not be used for the purpose of supporting or providing programs, services, or activities for individuals who are not eligible individuals as defined in the Act, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. Prior to providing family literacy activities for individuals who are not eligible individuals, an eligible provider shall attempt to coordinate with programs and services that do not receive funding under this title.

C. VOCATIONAL REHABILITATION PROGRAM

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

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

A transition plan is being developed with the core programs to integrate data systems into a statewide longitudinal management information system for the efficient exchange of data and streamlined service delivery systems. Delays to fully transition are attributed to the infrastructure damages from the back to back typhoons, pandemic, and other external factors.

Title II has registered for continued training by Geographic Solutions, Inc. this October 2022. Upon completion, plans are made to implement, upload data, and work with core partners to transition into using the VOS.

Title IV is coordinating a training schedule with the vendor.

Improvements to the CNMI's data infrastructure through the HireMarianas portal was expanded to include the Unemployment Insurance System and the Apprenticeship Module. The additional programs provides individuals virtual access to all the programs.

As mentioned in our preceding response, a transition plan is being developed with the core programs to migrate into an integrated data system to facilitate a streamlined intake and service delivery to track participation across programs that is aligned to the federal reporting requirements for all programs.

The progress of Titles II and IV are noted below:

Title II will continue VOS training by Geographic Solutions this October 2022. Once completed, data will be migrated into the system and VOS will be implemented. Title II will work closely with core partners to tie shared clients.

Title IV is coordinating a training schedule with Geographic Solutions.

The CNMI's State Workforce Development Board (SWDB) together with the core programs remains focused on the continuous improvements of the service delivery design to assist the Governor facilitate the alignment of technology and advances in data-sharing partnerships across programs. Developments are ongoing to bring together the core programs and other partners to a single platform to streamline access to the programs. Technology advancements include accessibility tools for individuals with disabilities.

Title II, Adult Education, is scheduled to continue training by Geographic Solutions in the VOS. After completion of training, Adult Education will migrate data into the system and implement the usage. The system will be able to communicate and allow sharing of data through the core partners. Access of data and other relevant information will allow real time ease of collecting needed data for reports. This management system alleviates lost time through back-and-forth communication from core partners. Data will be readily available through the system and reports are improved by showing how core programs are unified in their service delivery goals.

As mentioned in previous sections, the CNMI Core Programs have agreed to continue the efforts of transitioning from its current respective data systems to the Virtual Online/Virtual One-Stop System called HireMarianas. HireMarianas is an electronic data warehouse that collects, stores, and analyzes all information entered into the system. The VOS provides a fully-integrated report design compliant with state and federal requirements inclusive of the Participant Individual Record Layout (PIRL) requirement established by US DOL-ETA. The first program to fully implement the VOS system for data collection and reporting processes is the Title I Program. Due to delays in the roll out and implementation of the VOS among the three core partners and various disasters, the Title II and Title IV programs were delayed in being trained to use the VOS system as well as upload any data needed to populate the system in order to obtain information needed. Both Title II and IV programs continue to use their respective reporting systems such as TopsPro from CASAS and the locally built software system developed by Software Specialties designed to capture all required RSA-911 data elements of the Title IV program. Upon completion of the needed training and increased access to the VOS portal, both Title II and Title IV intend to continue to migrate their existing processes to the HireMarianas system so that all three core programs would be able to capture and generate the information needed for collection and reporting.

HireMarianas is a data management system with performance accountability linked to the federal reporting system (WIPS). NMI DOL has migrated to HireMarianas and successfully generated its first federally accepted quarterly performance reports and annual performance report for PY2018.

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

Consistent with the prescribed performance accountability indicators of the WIOA, the post-program successes of participants served by the core programs are assessed on a quarterly basis to evaluate progression in employment, earnings, and educational achievements of participants. The results are measured against the negotiated performance levels to determine the return on the federal investments and continuous improvements of the service delivery strategies to achieve greater outcomes.

As discussed in the plan, the core partners participation in the recent Evaluation Peer Learning Cohort provided greater insights to the requirements in the WIOA to conduct annual evaluations. Post-program assessments will be the basis in the proposed evaluation study on the effectiveness of the Work-Based Learning service delivery model to enter or progress in employment and/or educational advancements.

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

The CNMI is not a recipient of UI.

D. PRIVACY SAFEGUARDS

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

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

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

7. PRIORITY OF SERVICE FOR VETERANS

Priority of services for Veterans is guided by the following policy:

All WIOA-funded programs are required to implement the Veteran's priority provisions of the Jobs for Veterans Act. Veterans and covered spouses, who are determined eligible for WIOA services, are entitled to priority of service under WIOA Title I Adult, Dislocated Worker, and Youth-funded programs.

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

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

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

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

1. Veterans

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

2. The Spouse of a Veteran

The Spouse of:

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

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

DOL-WIA Division staff will collect and enter the required veteran and covered spouse's data elements into HireMarianas when enrolling veterans and covered spouses into WIOA programs. Proof of veteran and covered spouse status must be documented and kept in the applicant's file.

JVSG and DVOP programs are managed out of Guam. A key functional element of HireMarianas is the systems ability to flag registrants verified as Veterans and automated referral to the DVOP Specialist.

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

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

Accessibility

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

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

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

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

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

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

“DOL-WIA Division is an equal opportunity employer and provider of employment and training services. Auxiliary aids and services are available upon request for individuals with disabilities.”

CNMI DOL WIA is also an active partner of the CNMI Disability Provider Network and has access to Auxiliary Aids and Services from partners which are made available upon request. The Virtual Online/One-Stop System is designed to be accessible as well.

CNMI OVR is an equal opportunity employer ensuring accessible programs and facilities for individuals with disabilities.

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

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

- 1) The number or proportion of LEP persons served or encountered in the eligible service population;
- 2) The frequency with which LEP individuals come in contact with the program;
- 3) The nature and importance of the program, activity or service provided; and,
- 4) The resources available and costs. It may be determined, as a result of the analysis, that different language assistance measures are sufficient for the different programs or activities provided. Regardless of the number or proportion of individuals, reasonable efforts must be made to meet the particular language needs of LEP individuals.

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

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

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes

The State Plan must include	Include
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

The CNMI SWDB recognizes itself as a single state workforce development board and incorporates local area requirements into the operational manual in order to be in compliance with WIOA. Rota and Tinian route all their documents to Saipan for analysis, assessment, review, modification and/or approval. All fiscal and performance criterias are subject to the same requirements throughout the CNMI and follow the CNMI and Federal rules and regulations. Documents are then routed to the appropriate channels for checks and balances and follow the stipulated requirements of the designated department units, the overall CNMI central government and federal regulations.

The CNMI State Workforce Development Board serves as a single state workforce development board that oversees both local and state areas. This is done through the appointment of island representatives from each region by the highest locally elected official per island. In the case of the CNMI, the Governor does appointments for the island of Saipan, and appoints representatives from the islands of Rota and Tinian through consultation with their respective mayors (the highest elected official in each island respectively). Any appeal of such would be referred to the SWDB Executive Committee who will then confer with the appropriate members of each respective island as well as the SWDB as a whole, and then referred back to the Governor who will then request each mayor for their respective input. For the ETPL process of appeals, the appeals policy has been amended and adopted as follows:

An applicant or eligible training provider may appeal to the SWDB Executive Committee the denial or de-listing of the initial or continued eligibility on the ETPL or the removal of a program(s) already listed on the ETPL.

1. A provider wishing to appeal a decision by the SWDB must submit an appeal to the SWDB Executive Committee within 30 days of the issuance of the denial or removal notice. The appeal must be in writing and include a statement of the desire to appeal, specification of the program in question, the reason(s) for the appeal (i.e. grounds), and the signature of the appropriate Provider official.
2. Upon receipt of the written appeal, the SWDB shall schedule a hearing to be held at or before the next quarterly meeting of the SWDB. Both the appellant and SWDB members shall have the opportunity to present oral and written testimony under oath; to call and question witnesses; to present oral and written arguments; to request documents relevant to the issues, and to be represented.
3. The SWDB Executive Committee will notify appellants of its final decision on an appeal within 30 days of the hearing. This period includes a hearing, if requested by the Provider.

The CNMI's workforce development system does not have a One-Stop Center or American Job Center. As such, a policy and procedure is not established. However, internal polices are established for each of the WIOA mandated partner programs to allow relevant parties to file grievance and/or complaint, including appeals.

2. STATEWIDE ACTIVITIES

The SWDB has adopted a Policies and Procedures Operations Manual that guides the CNMI DOL in implementing the Workforce Innovation and Opportunity Act in the CNMI for statewide

workforce development systems and utilization of State funds for workforce investment activities.

A. State Reserve

§ 683.120 (b)

Of the WIOA formula funds allotted for services to youth, adults and dislocated workers, the Governor must reserve not more than 15 percent of the funds from each of these sources to carry out statewide activities. Funds reserved under this paragraph may be combined and spent on statewide activities under WIOA sec. 129(b) and statewide employment and training activities under WIOA sec. 134(a), for adults and dislocated workers, and youth activities without regard to the funding source of the reserved funds.

Required statewide employment and training activities are: § 682.200

(a) Required rapid response activities, as described in § 682.310;

(b) Disseminating by various means, as provided by WIOA sec. 134(a)(2)(B):

(1) The State list of eligible training providers (including those providing non-traditional training services), for adults and dislocated workers and eligible training providers of registered apprenticeship programs;

(2) Information identifying eligible providers of on-the-job training (OJT), customized training, incumbent worker training (see § 680.790 of this chapter), internships, paid or unpaid work experience opportunities (see § 680.180 of this chapter) and transitional jobs (see § 680.190 of this chapter);

(3) Information on effective outreach and partnerships with business;

(4) Information on effective service delivery strategies and promising practices to serve workers and job seekers;

(5) Performance information and information on the cost of attendance, including tuition and fees, consistent with the requirements of §§ 680.490 and 680.530 of this chapter;

(6) A list of eligible providers of youth activities as described in WIOA sec. 123; and

(7) Information of physical and programmatic accessibility for individuals with disabilities;

(c) States must assure that the information listed in paragraphs (b)(1) through (7) of this section is widely available;

(d) Conducting evaluations under WIOA sec. 116(e), consistent with the requirements found under § 682.220;

(e) Providing technical assistance to State entities and agencies, local areas, and one-stop partners in carrying out activities described in the State Plan, including coordination and alignment of data systems used to carry out the requirements of this Act;

(f) Assisting local areas, one-stop operators, one-stop partners, and eligible providers, including development of staff, including staff training to provide opportunities for individuals with barriers to employment to enter in-demand industry sectors or occupations and nontraditional occupations, and the development of exemplary program activities;

(g) Assisting local areas for carrying out the regional planning and service delivery efforts required under WIOA sec. 106(c);

(h) Assisting local areas by providing information on and support for the effective development, convening, and implementation of industry and sector partnerships;

- (i) Providing technical assistance to local areas that fail to meet the adjusted levels of performance agreed to under § 677.210 of this chapter;
- (j) Carrying out monitoring and oversight of activities for services to youth, adults, and dislocated workers under WIOA title I, and which may include a review comparing the services provided to male and female youth;
- (k) Providing additional assistance to local areas that have a high concentration of eligible youth; and
- (l) Operating a fiscal and management accountability information system, based on guidelines established by the Secretary.

Allowable statewide employment and training activities may include: § 682.210

- (a) State administration of the adult, dislocated worker and youth workforce investment activities, consistent with the five percent administrative cost limitation at WIOA sec. 134(a)(3)(B) and § 683.205(a)(1) of this chapter;
- (b) Developing and implementing innovative programs and strategies designed to meet the needs of all employers (including small employers) in the State, including the programs and strategies referenced in WIOA sec. 134(a)(3)(A)(i);
- (c) Developing strategies for serving individuals with barriers to employment, and for coordinating programs and services among one-stop partners;
- (d) Development or identification of education and training programs that have the characteristics referenced in WIOA sec. 134(a)(3)(A)(iii);
- (e) Implementing programs to increase the number of individuals training for and placed in non-traditional employment;
- (f) Conducting research and demonstrations related to meeting the employment and education needs of youth, adults and dislocated workers;
- (g) Supporting the development of alternative, evidence-based programs, and other activities that enhance the choices available to eligible youth and which encourage youth to reenter and complete secondary education, enroll in postsecondary education and advanced training, progress through a career pathway, and enter into unsubsidized employment that leads to economic self-sufficiency;
- (h) Supporting the provision of career services in the one-stop delivery system in the State as described in § 678.430 of this chapter and WIOA secs. 129(b)(2)(C) and 134(c)(2);
- (i) Supporting financial literacy activities as described in § 681.500 of this chapter and WIOA sec. 129(b)(2)(D);
- (j) Providing incentive grants to local areas for performance by the local areas on local performance accountability measures;
- (k) Providing technical assistance to Local Workforce Development Boards (WDBs), chief elected officials, one-stop operators, one-stop partners, and eligible providers in local areas on the development of exemplary program activities and on the provision of technology to facilitate remote access to services provided through the one-stop delivery system in the State;
- (l) Providing technical assistance to local areas that are implementing WIOA Pay-for-Performance contract strategies and conducting evaluations of such strategies. Technical assistance may include providing assistance with data collections, meeting data entry requirements, and identifying level of performance;

(m) Carrying out activities to facilitate remote access to training services provided through the one-stop delivery system;

(n) Activities that include:

(1) Activities to improve coordination of workforce investment activities, with economic development activities; and

(2) Activities to improve coordination of employment and training activities with child support services and activities, cooperative extension programs carried out by the Department of Agriculture, programs carried out by local areas for individuals with disabilities (including the programs identified in WIOA sec. 134(a)(3)(A)(viii)(II)(cc)), adult education and literacy activities including those provided by public libraries, activities in the correction systems to assist ex-offenders in reentering the workforce and financial literacy activities; and

(3) Developing and disseminating workforce and labor market information;

(o) Implementation of promising practices for workers and businesses as described in WIOA sec. 134(a)(3)(A)(x);

(p) Adopting, calculating, or commissioning for approval an economic self-sufficiency standard for the State that specifies the income needs of families, by family size, the number and ages of children in the family, and sub-State geographical considerations;

(q) Developing and disseminating common intake procedures and related items, including registration processes, across core and partner programs; and

(r) Coordinating activities with the child welfare system to facilitate provision of services for children and youth who are eligible for assistance under sec. 477 of the Social Security Act.

The CNMI serves as a Single Workforce Development Board and the use of WIOA funds for statewide activities are delegated to the SWDB's Program Committee who will review programs and activities and make recommendations to the SWDB for either approval or disapproval. This new system helps the SWDB better account for the SWDB policies and procedures and allows for proper guidance in executing the CNMI's statewide workforce development system's expenditure of state funds for identified workforce investment activities that are considered allowable and approved provided for by WIOA and identified workforce investment allowable funding activities.

The Program Committee of the State Workforce Development Board provides leadership in the review of all DOL WIOA program applications for WIOA funding and makes recommendations to the SWDB and DOL WIA on the development, approval/denial, tracking, monitoring, continuance or discontinuance of the program, service providers, and services offered by DOL-WIA Division to ensure program services complies with the mandates of WIOA. The committee will also distinguish which programs and services will be done State-wide or specific to local areas.

An example of such is the SWDB's move towards a recognizing a Statewide activity is the adoption of a Statewide Leadership Development program for Youth, Adults, and Dislocated Workers. This was done in hopes of developing the abilities and skills for participants to address personal, custom, and social stigmatic issues of becoming and being a leader, including gaining the confidence and skills needed to perform and be respected at this level.

The CNMI will utilize the Governor's respective set aside funding percentage on allowable statewide activities provided under the WIOA and as established by the SWDB policies and state plan within applicable CNMI and Federal regulations. This includes the set aside of up to 25% of statewide funds for rapid response to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers.

CNMI DOL follows Title 80 and the applicable subsections of the CNMI Administrative Code to help companies and affected employees when they make their announcement of closures or reduction in force. All employers must first inform CNMI DOL if they intend to conduct layoffs, closures, or affect their employees with CNMI DOL. CNMI DOL then follows the SWDB Operations Manual and provides Rapid Response services such as outreach to both employers and employees about WIOA services, labor market information, job search services, resume building, training, and transitioning between employment types of services and resources, to aid the employer and the workers as they go through this transition.

Furthermore, Rapid Response activities begin by contacting the company and arranging an initial meeting. These employer meetings help determine whether the layoff can be avoided and what services will be made available to the employees if it cannot. If the layoffs cannot be avoided, CNMI DOL will share with the dislocated workers the services and resources available to them including training opportunities through WIOA, and other forms of hardship assistance. CNMI DOL provides access to WIOA services including core services such as labor market information, skill assessments, job search assistance, and resume advice. If CNMI DOL determines there is a need, they can also enroll the dislocated worker in intensive and training services to provide skill upgrading and certification in local demand occupations. CNMI DOL will also provide much of the front line services that the dislocated workers will need, including presentations, providing workshops, and assisting the dislocated workers in accessing other necessary services.

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

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

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

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

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

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

The CNMI SWDB Manual adopts the following:

6.20 WORK BASED TRAINING

A. On-the-Job Training Program (OJT) OJT is defined at WIOA sec. 3(44). OJT is provided under a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. Through the OJT contract, occupational training is provided for the WIOA participant in exchange for the reimbursement, typically up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and supervision related to the training. OJT contracts under WIOA title I, must not be entered into with an employer who has received payments under previous contracts under WIOA or WIA if the employer has exhibited a pattern of failing to provide OJT participants with continued long-term employment as regular employees with wages and employment benefits (including health benefits) and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's IEP.

1. Employed Workers OJT contracts may be written for eligible employed workers when:

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

(b) The requirements are met; and

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

B. INTERNSHIPS AND WORK EXPERIENCES For the purposes of WIOA sec.

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

C. CUSTOMIZED TRAINING Customized training is training:

(a) That is designed to meet the special requirements of an employer (including a group of employers);

(b) That is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and

(c) For which the employer pays for a significant cost of the training Coordination of Workforce Innovation and Opportunity Act training funds and other grant assistance WIOA funding for training is limited to participants who:

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

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

2. REGISTERED APPRENTICESHIP

The CNMI is working with the Guam Department of Labor to model an approved Registered Apprenticeship Program and System in the CNMI. The CNMI is committed to the inclusion of a Registered Apprenticeship Program with increased interests being generated by potential employer sponsors.

While the CNMI is still without an approved RA program, we were awarded the Apprenticeship State Expansion grant. Service design and delivery is presently under development. The draft policies and standards proposes to model service delivery with existing practices for WIOA customers.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

The CNMI's State Workforce Development Board has amended its policies and procedures and adopted the following to determine procedures, eligibility requirements, determination of initial and continued eligibility for training providers, including Registered Apprenticeship programs:

Procedure:

The SWDB approved an initial/continued eligibility application process that allows for interested or existing Training Providers to submit an application to the SWDB for review and consideration. Such application is reviewed by CNMI DOL for compliance and is then shared with the SWDB Program for further review and recommendation for approval or disapproval of the entire SWDB. The approval/disapproval or recommendation of the SWDB is then shared with the applicant and CNMI DOL for execution of decision. Further details follows:

Eligibility Requirements:

Providers of training services are required to be on the CNMI's Eligible Training Provider List (ETPL) in order to receive WIOA Title I Adult, Dislocated Worker and Youth funding. To be eligible to receive funds for the provision of Individual Training Accounts or ITA's, the provider shall meet conditions 1-7 below:

Condition 1:

- Be an accredited institution of higher education that provide a program that leads to a recognized postsecondary credential; This may include programs receiving approval or accreditation by the U.S. Department of Education, OR

- An entity that carries out Apprenticeship Programs, OR
- Other public or private providers that provide training, which may include community-based organizations (CBO's) and joint labor-management organizations;
- Eligible providers of adult education and literacy activities under WIOA Title II if such activities are provided in combination with training services.
- Other SWDB recognized entities.

Condition 2:

- Have been in business in the CNMI for at least one year prior to application **with the exemption of RAP programs or others exempted by the SWDB.**

Condition 3:

- Provide documentation of the following:
 - Legal Standing in the Commonwealth of Northern Marianas Islands (CNMI Business License or Certification from the Department of Commerce as an Educational Institute¹, if applicable;
 - Federal Employer Identification Number;
 - Accrediting body and contact information;
 - Credential Type and Sample Copy;
 - A copy of the current certification or note from the certification body detailing the status at application.
 - A description of the most recent student enrollment that details sources of financial support; and
 - A listing of the current Board of Directors, if applicable.

Condition 4:

- Provide assurances of compliance with all non-discrimination, equal opportunities provisions, and other requirements of WIOA.

Condition 5:

- Provide assurance of cooperation with monitoring requirements, including participation in monitoring visits, routine programmatic and fiscal monitoring, onsite review to evaluate, at minimum, physical location and facilities; instructional quality and programmatic accessibility; accessibility and ADA compliance conducted by the SWDB and/or DOL-WIA staff.

Condition 6:

- Provides programs and services relevant to the needs of the CNMI.

Condition 7:

- **Comply with the approved WIOA Performance Targets for Entered Employment 2nd and 4th Quarters after Exit; Median Earnings; Credential Attainment; and Measurable Skill Gains. Performance is reviewed each year (July 1-June 30th) on a per program basis. The SWDB reserves the right to remove training programs**

that do not meet minimum performance and/or training providers who demonstrate trends of under performance.

[i]Applicable to entities accepting foreign students present in the CNMI or seeking entry under a Foreign Student Entry Permit

Eligible Training Provider List Exemptions:

There are some training services/programs that are exempt from the ETPL or are subject to other policy provisions. These exceptions include the following:

a) On-the-Job Training (OJT) - Training by a CNMI based employer **and/or approved apprenticeship training** that is provided to a paid participant while engaged in productive work in a job that provides knowledge and skills essential to the full and adequate performance of the job and is made available through an OJT program;

b) Customized Training

- That is designed to meet the specific hiring and retention requirements of an employer (including a group of employers);
- That is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and,
- For which the employer:
 - Pays a significant portion of the cost of training, as determined by the board involved, taking into account the size of the employer and such other factors as the board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training, **apprenticeship**, and advancement opportunities; and,

c) Incumbent worker training - Training designed to assist workers **and those participating in apprenticeship** in obtaining the skills necessary to retain employment or avert layoff;

d) Transitional Jobs - Time-limited work experiences which are to be combined with comprehensive employment and supportive services and are to be designed to help individuals establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention of unsubsidized employment;

e) Internships and Work Experience - Planned, structured learning experience that takes place in a workplace for a limited period of time not to exceed a year. Work experience may be paid or unpaid, as appropriate. An internship or work experience may be arranged within the private, for profit sector, the non-profit sector, or the public sector.

f) Instances where the SWDB determines the following:

1. There is an insufficient number of eligible providers of training services.
2. An exception is necessary to meet the needs of individuals with barriers to employment.
3. That it would be most appropriate to award a contract to an institution of higher education or other eligible provider to facilitate the training of multiple individuals in in-demand industry sectors or occupations, and such Contracts does not limit customer choice; or the board provides training services through a pay-for-performance contract.

g) Registered Apprenticeship Sponsors – Registered Apprenticeship Programs (RAP) and sponsors are automatically eligible to be included on the ETP List and are exempt from the ETP eligibility requirements (Conditions 1-7), upon approval from US DOL Office of Apprenticeship.

The RAP sponsor will be invited and encouraged by the RA Program Manager of the option to be included in the ETP List. If agreed, the RA Program Manager or assigned DOL-WIA personnel will provide the basic information needed to the SWDB for inclusion in the ETP such as:

- **Occupations included with the RAP;**
- **The name and address of the RAP sponsor;**
- **The name and address(es) of the Related Technical Instruction provider(s) and the location(s) of instruction if different from the program sponsor's address;**
- **The method and length of instruction; and**
- **The number of active apprentices.**

A RAP sponsor may be delisted from the ETP list if:

- **The RAP program notifies the state agency it no longer wants to be included in the list;**
- **The program becomes deregistered under the National Apprenticeship Act;**
- **The program is determined to have intentionally supplied inaccurate information; or,**
- **A determination is made that the RAP substantially violated any provision of Title I of WIOA or the WIOA regulations, including 29 CFR part 38.**

Determining Training Provider Initial and Continuing Eligibility:

Initial eligibility applies to all training providers, with the exception of those listed in the Exemptions (Section 8.40). New Providers will be continually added to the ETPL as they become eligible. Initial eligibility remains in effect for one (1) calendar year from the date of approval.

To meet initial eligibility, a training provider or institution must meet the conditions in Section 8.40 and provide all of the following:

1. Information about the provider and each proposed training program;
2. Evidence of program accreditation and/or provider educational license with appropriate state or governing entity;
3. Information identifying the industry-recognized credential, national or state certificate or degree, including all industry appropriate competencies, licensing and/or certification requirements. Providers must demonstrate as part of the initial eligibility process the mechanism for awarding such credentials, certificates and/or degrees. Regardless of whether the provider's program requires a third-party certification for credential attainment/national or state certificate award, the provider is responsible for

appropriately reporting such attainment to the SWDB and DOL-WIA. Copies of credentials/certificates must be made available to DOL-WIA;

4. A description of the training program's relationship or partnership with industry-related employers;
5. Information demonstrating alignment of training program with the CNMI's In-demand Sectors and Occupations;
6. Information on program cost per participant, including course catalogue or brochures demonstrating that all program-related costs are standard rates charged to the public. The course fees must be competitive with similar courses offered in the region. The SWDB reserves the right to request supporting documentation to demonstrate a cost comparison within the region. Note that to ensure the best use of funds, DOL-WIA gives preference to quality programs available for free or low cost to the community;
7. A copy of the provider's refund, grievance, drug testing (if applicable), equal opportunity, and ADA accessibility policies;
8. A description of training facilities and equipment to be utilized for each program, including evidence that such training facilities and equipment are safe, accessible by public transportation, and ADA compliant to provide an environment conducive to student achievement;
9. Information about performance for the most recent twelve (12) month period that includes:
 1. Completion rates for all individuals in the listed program;
 2. Percentage of all individuals participating in the listed program who obtain unsubsidized employment after program exit
 3. Wages at placement in employment of all individuals participating in the listed program
 4. Percentage of program completers who attained a post-secondary credential, secondary school diploma or equivalent during program participation or within one (1) year after program completion; and
10. Approved providers may enter into agreements with training organizations to deliver content on their behalf. In doing so, the approved provider accepts all liability and certifies that the program, meets the approved providers' requirements for content and instructors as well as all other SWDB and DOL-WIA policies and procedures. The approved provider is the sole contact for the SWDB and DOL-WIA. Approved providers must notify the SWDB and DOL-WIA of any program that will be delivered by training organizations or other third parties. The SWDB reserves the right to audit or review any course or instructor qualifications at any time;
 1. SWDB will only evaluate and sanction the approved provider or entity.
11. Any additional information requested by the SWDB.

ETPL INITIAL ELIGIBILITY PROCESS

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

1. Training providers interested in applying to become part of the ETPL must complete the SWDB Eligible Training Application for Initial Eligibility and submit to the SWDB.

2. The SWDB Program Committee will review all submitted materials, request clarification or follow up as necessary and confirm that the organization is not debarred from doing business in the CNMI and with the federal government.

3. Confirmation of approval or denial will be issued within 30 days from the SWDB review period of the application.

4. Once the SWDB approves a program(s), the program becomes visible to the WIOA Core Programs (DOL-WIA, NMC-ABE, and OVR) and will be made accessible to the general public.

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

Determinations

The SWDB shall make a determination with respect to an application for initial eligibility within 30 calendar days of the review period and receiving all of the required information. The SWDB shall notify an applicant if an application is determined to be incomplete, and shall keep such application open for a period of 90 calendar days from the date of receipt. If an applicant fails to submit all required information or materials with this 90-day period, the SWDB shall deny the application, and the applicant must wait 30 calendar days before resubmitting an application.

An initial eligibility determination will be decided for each training provider on a program-to-program basis and be based on the following criteria:

1. The ability of the program to offer education and/or training programs necessary resources and services to support student attainment of goals.
2. The degree to which the program relates to in-demand industry sectors and occupations within the CNMI.
3. Whether the program leads to an industry-recognized certificate or credential, including post-secondary credentials
4. The degree to which program completion is directly connected to related industry employment.

The SWDB will evaluate all programs on the ETPL on a bi-annual basis to ensure that they continue to meet eligibility requirements beyond the period of initial eligibility. Eligible training providers seeking to be determined as eligible for continued eligibility must provide the following:

1. Performance Data Report for each approved training program that includes the quality of the program/training and data on all program participants that shows:
 - a. Completion Rate
 - b. Employment and employment retention rate (2nd and 4th quarters after exit)
 - c. Credential attainment rate; and
 - d. Median wage after program completion
2. Access to training services throughout the CNMI.
3. Information on any additions or modifications to programs and services offered including course summary, learning outcomes, breakdown of costs, credentials to be attained, and class schedule;

4. Currently published course catalog with student cost information;
5. Current copies of the providers' refund, grievance, drug testing (if applicable), equal employment opportunity, and ADA accessibility policies, if changes have occurred since the initial eligibility period;
6. Updated information pertaining to alignment of training program with the CNMI's In Demand Sectors and Occupations and any additional information required by the SWDB;
7. Most recent program accreditation and/or provider educational license;
8. Student roster information for all training participants for each approved program;
9. A current academic calendar;
10. The ETP's ability to provide training services that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.
11. Any additional information required by the SWDB.

Determinations

The SWDB shall make a determination with respect to an application for continued eligibility within 30 calendar days of receiving all requested information. The SWDB shall notify an applicant if an application is determined to be incomplete, and shall keep such application open until the expiration of the provider's ETP contract. If a provider fails to submit all required information or materials before the expiration of the ETP contract, the SWDB shall deny subsequent eligibility, and the provider must reapply under the terms of initial eligibility.

A continued eligibility determination will be decided for each training program on a program to program basis and be based on the following criteria:

1. The ability of the program to offer education and/or training programs necessary resources and services to support student attainment of goals.
2. The degree to which the program relates to in-demand industry sectors and occupations in the CNMI.
3. Whether the program leads to an industry-recognized certificate or credential, including post-secondary credentials.
4. The degree to which program completion is directly connected to related industry employment.
5. The ability to meet the minimum performance measures established by the SWDB as negotiated with USDOL ETA.

Failure to Meet Performance Requirements

If an eligible training provider fails to meet or exceed performance levels for at least two of the performance indicators and fails to achieve at least 70 percent of the required performance levels for each of the performance indicators, the ETP will be removed from the ETPL and be ineligible to apply for a period of one (1) year.

If an eligible training provider has failed to meet required performance levels for one or more of the performance indicators but has either a) met or exceeded performance levels for two or more of the performance indicators, or b) achieved at least 80% of the required performance levels for each performance indicator, they shall be placed on probationary status. The SWDB may approve an application for subsequent eligibility for an eligible training provider on

probationary status for one (1) year if the eligible training provider enters into a performance improvement plan that describes how the provider will meet or exceed performance levels for the subsequent year.

If an eligible training provider on probationary status fails to meet or exceed performance levels for each of the five performance indicators during the subsequent year, they will be removed from the CNMI's SWDB ETPL, and will be ineligible to apply for the ETPL for a period of one (1) year.

OUT OF STATE/ONLINE PROVIDERS

Providers outside of the Commonwealth of the Northern Mariana Islands who have in-state training facilities may provide training services in the CNMI but will be required to comply with the eligibility requirements outlined in this policy. Providers which deliver content fully online will be looked at on a case-by-case basis.

PRICE CHANGE

The original price of the training program submitted with the approved program application must be used for the duration of the program unless the provider submits a request to the SWDB with the reason for the change and complete the ETPL Application Attachment A. The new price will take effect after the SWDB approves the price change. If Provider makes a price change without approval, the SWDB reserves the right to delist the program or limit reimbursement to the approved price.

REFUNDS

Training providers are required to refund to DOL-WIA all or a portion of the cost of the training if a participant does not complete the program. If a provider has a tiered (i.e. allows for full and/or partial refunds depending on portion of program completed) drop and refund policy which has been approved by the board and is publicly available to all perspective students, that policy may be used; however, a copy must be provided to the SWDB for review and approval. If the provider does not have a drop and refund policy in place and/or the drop and refund policy is not tiered (i.e. does not allow for full and/or partial refunds depending on portion of program completed) the provider must follow and publish the below refund policy:

Enrollment/Participation Status	Refund Level
Registered but did not start program	No payment will be made to provider
Attended 7 days or fewer	Full refund
Attended less than 75% of program	Partial refund
Attended 76%-100% of program	No refund required

Failure to appropriately refund DOL-WIA, or significant delays in issuing refunds, may result in removal from the ETPL. If an accredited, approved provider chooses to work with a third party to deliver any services using WIOA funds, that third party is also subject to the above drop and refund guidance. All refunds will be coordinated through the approved provider only. The SWDB and/or DOL-WIA will NOT work directly with any third parties. The approved provider is responsible for any and all resolution required with its third parties.

AND REMOVAL

1. Denial of Initial Eligibility

The State Workforce Development Board or SWDB may deny an application and/or its program(s) if:

1. The applicant fails to meet the minimum criteria for initial eligibility as specified in Section 8.40
2. The initial eligibility application is not complete.
3. The applicant intentionally supplied inaccurate information. Penalties are described in WIOA Sec. 122(f)(1)(A) and subparagraph (C).
4. The applicant substantially violated any requirement under WIOA. Penalties are described in WIOA Sec. 122(f)(1)(B) and subparagraph (C).
5. The program needs, funding or convenience do not require the service.
6. The training program is available for free or lower cost from another source in the community.
7. Does not meet federal or local assurances
2. Removal of Provider or Program from the ETPL

A Training provider and/or its program(s) may be removed from the ETPL for the following reasons:

1. The training provider fails to meet the minimum criteria for continued eligibility as specified in Section 8.60.
2. The training provider fails to furnish participant data and performance data required for the performance review with the established due date.
3. It is determined the training provider intentionally supplied inaccurate information.
4. It is determined that the training provider substantially violated any requirement under WIOA.
5. The training provider or program loses its educational license or accreditation.
6. The training provider or program fails to meet the minimum levels of performance established by the SWDB.
7. The training provider fails to notify the SWDB of any program changes including, but not limited to, costs or location of training.
8. It is determined the training provider is not eligible to do business with the Commonwealth of the Northern Marianas Islands.
9. The training provider is now debarred from doing business with the Federal Government.
10. The training provider has experienced fraud, malfeasance or other illegal activity involving WIOA funds or participants.
11. The training provider has not complied with Equal Opportunity and Nondiscrimination guidelines.
12. Customer satisfactions surveys demonstrate a history of challenges with the program or provider.
13. The training provider has a history of failure to provide refunds as required under the policy.
14. DOL-WIA program needs, funding or convenience no longer require the service.

15. The training program is available for free or lower cost from another source in the community.
16. Does not meet federal or local assurances.

An applicant or eligible training provider may appeal to the SWDB Executive Committee the denial or de-listing of the initial or continued eligibility on the ETPL or the removal of a program(s) already listed on the ETPL.

1. A provider wishing to appeal a decision by the SWDB must submit an appeal to the SWDB Executive Committee within 30 days of the issuance of the denial or removal notice. The appeal must be in writing and include a statement of the desire to appeal, specification of the program in question, the reason(s) for the appeal (i.e. grounds), and the signature of the appropriate Provider official.
2. Upon receipt of the written appeal, the SWDB shall schedule a hearing to be held at or before the next quarterly meeting of the SWDB. Both the appellant and SWDB members shall have the opportunity to present oral and written testimony under oath; to call and question witnesses; to present oral and written arguments; to request documents relevant to the issues, and to be represented.
3. The SWDB Executive Committee will notify appellants of its final decision on an appeal within 30 days of the hearing. This period includes a hearing, if requested by the Provider.

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

The CNMI SWDB amended its policy on Adult Priority of Services (Section 3.80 CNMI WIOA Policy Manual) as follows:

3.80 ADULT PRIORITY OF SERVICES

Amended and Approved 04/08/2021

Service Priority for Individualized Services and Training

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

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

Veterans under WIOA §3 (63)(A) receive priority of service as described in the Jobs for Veterans Act (38 U.S.C. 4215 (2)). Veterans and eligible spouses of veterans who otherwise meet the eligibility requirements for adult programs must receive the highest priority for

services. Priority must be provided in the following order:

1. First, to veterans and eligible spouses who are also recipients of public assistance, are low income individuals, or who are basic skills deficient. Military earnings are not to be included as income for veterans and transitioning service members.
2. Second, individuals who are not veterans or eligible spouses who meet WIOA priority criteria.
3. Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
4. Last, to individuals outside the groups given priority under WIOA.

Program staff must ensure that at least 75% and no lower than 50.1 % of participants receiving individualized career and training services in the Adult program are from at least one of the priority groups mentioned above.

Monitoring is conducted through monthly data validation and case file reviews. In addition, the management information system at HireMarians.com - WIOA application identifies the specific priority criteria (public assistant and low-income, basic skill deficient, veteran priority of service, etc.) at eligibility determination to ensure compliance with the requirements.

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

Policy : DOLWIA2018.001

Transfer of Funds WIOA Adult/Dislocated Worker Programs

Effective Date:

March 26, 2018

Purpose:

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

Background:

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

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

- **The maximum amount of Adult program and Dislocated Worker program funds that can be transferred per annual allocation (includes both the Program Year (PY) and Fiscal Year (FY) allocations) is 100 percent.**
- **Transfers from administrative funds to program funds within the same program's funding stream (i.e., Adult FY administrative funds to Adult FY program funds) do not require a plan modification.**

- The SWDB should analyze the changing economic conditions in the CNMI as well as the financial position of the CNMI DOL WIA in order to identify a need for additional funding flexibility. If such a demand exists and there is a need to transfer up to 100 percent of the original allocated or re-allotted formula allocation, the SWDB must work with the WIOA Director to identify areas of need and submit a request to the Governor for approval. The following information must be provided:

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

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

- General purpose or reason for the transfer between Adult and Dislocated Worker programs;

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

- The SWDB must provide information on how the transfer will affect the program from which the funds are being transferred;

- Narrative explanation of how the transferred funds will be used (example: increased funding for Work Experience Program, tuition assistance for Adults, etc.). • Provide any applicable and/or available SWDB minutes authorizing the request for the transfer

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

C. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA IN AWARDING SUCH GRANTS OR CONTRACTS.[11]

All providers are subject to the ETPL policy at Section VI(b)(3) of this plan.

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

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

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

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

3. Develop and implement education and training programs that are career path oriented
 4. Develop education and training programs that leads to recognized credentials
 5. Collaborate, partner, and leverage with other core partner programs resources that improves the expected outcomes and achievement of the program on its targeted OSY population
 6. Improve on the collection and analysis of OSY data on their education and skills development needs that will lead to the development of innovative education and training programs
 7. Implement innovative approaches of outreach services that targets OSY who are lacking high school equivalency diploma that encourages their participation back into the classroom
 8. Implement classroom and employment dual service approach that encourages the OSY population to be engaged in their educational attainment and employment
 9. Improve communications with other non-core workforce partner programs of the importance of a universal CNMI workforce development system design and implementation for the overall success of the CNMIs youth to adulthood workforce population
 10. Build strong collaborations with state leaders for greater support of youth programs that targets those considered at-risk or most-in-need youth population
 11. Develop a system of care across all levels of the CNMIs workforce development system that specifically targets the OSY population
 12. Incorporate the involvement of families as part of the system design for improved OSY outcomes
3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED, INCLUDING QUALITY PRE-APPRENTICESHIP PROGRAMS UNDER THE WORK EXPERIENCE PROGRAM ELEMENT. [12]

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

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

WIOA Core Programs and Non-Core Programs will work in collaboration to assure the elements consisting of—

1. tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;
2. alternative secondary school services, or dropout recovery services, as appropriate;
3. paid and unpaid work experiences that have as a component academic and occupational education, which may include—
 - (a) summer employment opportunities and other employment opportunities available throughout the school year;
 - (b) pre-apprenticeship programs;
 - (c) internships and job shadowing; and

(d) on-the-job training opportunities;

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

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

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

7. supportive services;

8. adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;

9. follow-up services for not less than 12 months after the completion of participation, as appropriate;

10. comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;

11. financial literacy education;

12. entrepreneurial skills training;

13. services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and

14. activities that help youth prepare for and transition to postsecondary education and training.

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

- Youths are provided information and referral to applicable or appropriate services that are available through the CNMI's WIOA Core Programs or other eligible providers to include training and educational programs that have the capacity to serve the participant either on a sequential or concurrent basis.
- Youth applicants not meeting enrollment is referred for further assessment, as necessary, and referred to appropriate programs to meet the basic skills and training needs of the applicant.

DISCLOSURE:

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

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

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

From K-12, to Higher Education Institution, Disabilities Programs including those from K-12, non-core youth program services, non-school season programs, private sector partnerships,

State leaders support elected and non-elected are all involved in the desire to develop a youth system of care at all levels that will ensure the delivery and successful outcome of all required 14 elements under WIOA but also the development of system of programs and services that addresses other barriers affecting the CNMIs overall youth population.

The CNMIs investments in its youth programs is considered paramount for the success of the CNMIs future human capital development. The CNMIs public school system governed by the CNMI State Board of Education oversees the elementary and secondary education of the CNMIs youth population. Private school institutions also fall under the purview of the CNMIs State Board of Education. At risk youth population are also accorded the same education rights. The CNMIs Public School System has implemented for numerous years on its school campus the Alternative Education Program specifically designed to assist students who are considered high risk and needing a different form of teaching environment that will help them succeed academically.

The CNMI Public School System administers the Cooperative Education Program where annually high school students are provided the opportunity to work with employers earning a stipend or subsidized wages. Additionally, the CNMIs Public School System administers the Career Technical and Education Program where career cluster focus is provided to the high school students preparing them in focusing on a career pathway that responds to the CNMIs overall workforce needs and economic development and success.

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

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

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

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

- Have poor school attendance rates; or
- Have a disability that warrants a school IEP; or
- Lack job readiness skills to secure and hold employment; or
- Show basic skills deficiency in reading, math or language skills (below 8.9 grade levels); or
- Have below average grades; or
- Have been expelled from school within the past 12 calendar months; or

- Have been suspended from school at least within the past 12 calendar months; or
- Have been previously placed in out-of-home (foster care, group home, or kinship care) for more than 6 month between the ages of 14-21; or
- Are children of incarcerated parents; or
- Have dropped out of a post-secondary educational program during the past 6 calendar months; or
- Have a poor work history, to include no work history; or
- Has a record of not being able to hold employment due to being fired, or quitting two or more jobs in the last six months; or
- Has a history of substance abuse; or
- Is a veteran; or
- No employment within the last 6 months

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

The CNMI through the promulgated rules and regulations of the Public School System references an individual “not attending school” as a dropout. A dropout is an individual who:

1. Was enrolled in school at any time during the previous school year;
2. Was not enrolled at the beginning of the current school year;
3. Has not graduated from high school or completed a Commonwealth approved education program, and
4. Does not meet any of the following exclusionary conditions:
 - a. Transfer to another public school, private school, or Commonwealth approved education program
 - b. Temporary absence due to suspension or school approved illness, or
 - c. Death

There are no state laws in the CNMI that define “attending school.” It is the policy of the CNMI State Workforce Development for the administering office (CNMI DOL-Workforce Investment Agency Division) to certify attendance through source documentations such as a certification of attendance from the educational institution; copy of class schedule at the time enrollment for WIOA services; or other acceptable document.

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

The CNMI follows the definition in WIOA Section 3(5)(B). Deficiencies of basic literacy skills are determined through the leveraging of services with our Title II core program partner. The Adult Basic Education program administers the standardized basic skills inventory tests. Pursuant to WIOA definition of basic skills deficient, assessment results that place functioning levels at 8th grade or below are deemed as basic skills deficient. In limited cases, staff observations of an individual's inability to compute or solve problems, or read, write, or speak English to function in a job is accepted.

D. SINGLE-AREA STATE REQUIREMENTS

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)
2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)
3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

d. Single-area State Requirements (D1-D4)

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

- **1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)**

The proposed modifications to the Unified State Plan for Program Years 2022-2023 was made available to the public on www.marianaslabor.net and www.ovrgov.net for thirty (30) days to allow for public comment beginning on February 10, 2022 and ending on March 10, 2022. In-person and virtual public forums were held on March 2nd and 8th, 2022. During the thirty (30) days public comment period, there were no public comments that represented disagreement with the proposed amendments to the State Plan.

- **2. The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)**

The CNMI Department of Labor is the responsible entity for the disbursement of grant funds.

- **3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)**

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

The CNMI Public School System delivers K-12 youth education services. There are numerous in school and after school programs that are administered by the CNMI Public School System and/or partnered with the private sector such as 1) Cooperative Education Program or COOP; 2) after school tutoring and mentoring programs; 3) youth takeover days in partnership with the local Chamber of Commerce; 4) summer programs for younger youth administered by the

Department of Community and Cultural Affairs funded by block grants under the Division of Youth Services; 5) summer youth employment and training programs funded under WIOA Title 1 Youth Funding Stream; 6) youth business enterprise programs in partnership with the Commonwealth Development Authority (CDA); 7) youth mentoring programs in partnership with local businesses that is aligned with the youths career/profession interest (a group dinner program engagement organized by the Public School System bringing business leaders to have a one-on-one conversation with the student about their similar career/profession interest).

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

The Northern Marianas Trades Institute also provides vocational technical high school, career, trades, and technical programs that targets both youth and adults. Programs offered are Hotel and Restaurant Operations, Culinary Arts, Automotive Technology, and National Center for Construction Education & Research Programs. Latte Academy provides opportunities in Hotel and Restaurant Operations, Computer Networking and Certification, Health Programs, Entrepreneurship and more.

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

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

Department of Labor - Workforce Investment Agency Division agrees to:

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

Adult Education State Office agrees to:

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

Office of Vocational Rehabilitation agrees to:

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

- Encourage individuals with disabilities that they refer to the WIOA Core Programs to self-disclose that they have a disability so that the programs can get a better idea of how many clients they have in common; and
- Identify any duplication of services and streamline program processes as necessary.

REFERRAL PROCEDURES

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

CROSS-TRAINING

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

CONFIDENTIALITY

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

FUNDING

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

ALLOCATION OF COSTS

The parties to this MOU agree to serve mutual consumers, as appropriate, with emphasis on leveraging of resources in consideration of limited financial resources of many if not all

Federally-funded programs, including the CNMI WIOA Core Programs. The implementation of a cost-sharing arrangement will help the agencies to serve more individuals determined eligible under their respective programs.

AMERICAN JOB CENTER (aka ONE-STOP CENTER)

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

TERMS OF AGREEMENT

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

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

The CNMI State Workforce Development Board awards grants and contracts for Title I activities in accordance to the ETPL policies for initial and continued eligibility. The process involves:

ETPL INITIAL/CONTINUED ELIGIBILITY PROCESS

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

1. Training providers interested in applying to become part of the ETPL must complete the SWDB Eligible Training Application for Initial/Continued Eligibility and submit to the SWDB.
2. The SWDB Program Committee will review all submitted materials, request clarification or follow up as necessary and confirm that the organization is not debarred from doing business in the CNMI and with the federal government.
3. Confirmation of approval or denial will be issued within 30 days from the SWDB review period of the application.
4. Once the SWDB approves a program(s), the program becomes visible to the WIOA Core Programs (DOL-WIA, NMC-ABE, and OVR) and will be made accessible to the general public.

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

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

DOL WIA Case Managers in consultation with the WIOA participant review LMI coupled with the ETPL to determine training interests and needs. This practice meets the provisions of informed consumer choice for WIOA eligible participants.

WIOA funding for training is limited to participants who:

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

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

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

The CNMI's State Workforce Development board through its standing committees, will coordinate activities and review local applications as agreed upon in the CNMI's Core Programs MOU found in section VI(d)(8) of the plan.

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

Memorandum of Understanding

Between the CNMI Workforce Innovation and Opportunity Act (WIOA) Core Programs: The Department of Labor - Workforce Investment Agency Division; The Adult Education State Office; and The Office of Vocational Rehabilitation

PURPOSE

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

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

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

Whereas WIOA requires States to strategically align workforce development; Promotes Accountability and transparency; Fosters regional collaboration; Improves the American Job Center System; Improves services to employers and promotes work-based training; Provides access to high quality training; Enhances workforce services for the unemployed and other job seekers; Improves services to individuals with disabilities; Makes key investments in serving disconnected youth and other vulnerable populations; Enhances the Job Corps Program; and Streamlines and strengthens the strategic roles of workforce development boards; Whereas, the authorizing and funding legislation of Vocational Rehabilitation, the Rehabilitation Act of 1973 as amended, which is Title IV of the Workforce Innovation and Opportunity Act calls for improved planning, coordination and collaboration between the Department of Labor-Workforce Investment Agency Division, Adult Education, and Vocational Rehabilitation, unified planning and increased services to youth in need, including students with disabilities, this MOU will help to foster a regular and sustained partnership among the aforementioned parties that involve: (1) unified planning; (2) data sharing; (3) leveraging of resources; (4) identifying duplication of services and streamlining processes; and (5) providing for an array of services necessary for consumers to achieve their employment goals in accordance with the provisions of law and regulations that govern each respective program's activities.

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

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

PROGRAM DESCRIPTION AND PROVISION OF SERVICES

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

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

Goals:

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

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

Registration Requirements to be verified for qualification include the following:

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

Additional Requirements may include:

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

Title II - Adult Education & Literacy The Northern Marianas College's Adult Education State Office receives an annual grant from the U.S. Department of Education. The statutory authority for this program is the Workforce Innovation and Opportunity Act (WIOA) of 2014. The mission of the office is to ensure that educationally disadvantaged adults of the community have the opportunities to acquire basic skills necessary to function more effectively and productively in order to gain upward mobility by providing opportunities that will enable them to pursue further education in support of the Northern Marianas College mission.

Goals and Objectives:

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

Who is Eligible?

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

(Taken from the Adult Education and Family Literacy Act of 2014) Application and Intake Process:

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

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

Step 3: Take O*Net Interest Profiler

Step 4: Register for classes/independent Study

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

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

A) Is an individual with a disability; and

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

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

D) Has legal status to allow employment in the CNMI or U.S. Vocational rehabilitation services are designed to lessen the impact or eliminate entirely the barriers to employment.

Services include, but are not limited to: assessment for determining eligibility and vocational rehabilitation needs, vocational rehabilitation counseling and guidance, information and referral, vocational and other training services, job search/placement assistance/job retention services, supported employment services, post-employment services, rehabilitation/assistive technology, pre-employment transition services, etc.

Services are individualized and provided in the context of an approved Individualized Plan for Employment (IPE). OVR consumers may be required to financially participate in their rehabilitation program. OVR's responsibility for administrative activities that cannot be delegated to any other agency or individual includes:

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

SPECIFIC PARTNER RESPONSIBILITIES

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

- Process the WIOA application of interested individuals with disabilities who desire training and employment assistance services in a timely manner but no later than ten working days after date of application;**
- Refer WIOA clients who are individuals with disabilities to OVR;**
- Refer WIOA clients, who may need to acquire basic skills necessary to function more effectively and productively in order to gain upward mobility, to the Adult Education State Office at the Northern Marianas College;**
- Assess the skill levels, aptitudes, and abilities of applicants with disabilities as well as determine need for support services and make referral to other community agencies as appropriate;**
- Offer career planning and counseling, job search, and placement assistance;**

- Make available employment statistics information, including labor market update, job vacancy listing, job skills necessary for listed jobs and occupations in demand, and other relevant information;
- Provide follow-up services including sustained employment counseling and guidance;
- Provide training services such as work experience and OJT;
- Participate in shared funding of mutual WIOA and OVR cases and ensure such participation occurs with regularity; and
- Identify any duplication of services and streamline program processes as necessary.

Adult Education State Office agrees to:

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

Office of Vocational Rehabilitation agrees to:

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

- Provide guidance and information on disability employment matters;
- Participate in shared funding of mutual OVR and WIOA cases and ensure such participation occurs with regularity;
- Encourage individuals with disabilities that they refer to the WIOA Core Programs to self-disclose that they have a disability so that the programs can get a better idea of how many clients they have in common; and
- Identify any duplication of services and streamline program processes as necessary.

REFERRAL PROCEDURES

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

CROSS-TRAINING

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

CONFIDENTIALITY

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

FUNDING

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

ALLOCATION OF COSTS

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

AMERICAN JOB CENTER (aka ONE-STOP CENTER)

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

TERMS OF AGREEMENT

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

E. WAIVER REQUESTS (OPTIONAL)

TITLE I-B ASSURANCES

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the	Yes

The State Plan must include	Include
legal requirements for membership;	
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	52.6%	50.0%	52.6%
Employment (Fourth Quarter)	50.0%	50.0%	50.0%	50.0%

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
After Exit)				
Median Earnings (Second Quarter After Exit)	\$3,200	\$4,200	\$3,200	\$4,200
Credential Attainment Rate	66.5%	80.0%	66.5%	\$80.0%
Measurable Skill Gains	50.0%	75.9%	50.0%	75.9%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	50.0%	50.0%	50.0%
Employment (Fourth Quarter After Exit)	50.0%	50.0%	50.0%	50.0%
Median Earnings (Second Quarter After Exit)	\$3,200	\$4,200	\$3,200	\$4,200
Credential Attainment Rate	66.5%	66.5%	66.5%	66.5%
Measurable Skill Gains	50.0%	71.4%	50.0%	71.4%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
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Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	57.8%	50.0%	57.8%
Employment (Fourth Quarter After Exit)	50.0%	50.0%	50.0%	50.0%
Median Earnings (Second Quarter After Exit)	\$3,000	\$4,000	\$3,000	\$4,000
Credential Attainment Rate	66.6%	66.6%	66.6%	66.6%
Measurable Skill Gains	50.0%	70.0%	50.0%	70.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

A. EMPLOYMENT SERVICE STAFF

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.

The CNMI is not a recipient of WP.

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

Not applicable.

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 IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

Not applicable.

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

Not applicable

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

Not applicable.

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:

Not applicable

Not applicable

Not applicable

Not applicable

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

Not applicable

2. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

Not applicable

3. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION

Not applicable

4. OUTREACH ACTIVITIES

Not applicable

Not applicable

Not applicable

Not applicable

Not applicable

Not applicable

5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

Not applicable

Not applicable

Not applicable

6. OTHER REQUIREMENTS

A. COLLABORATION

Not applicable

B. REVIEW AND PUBLIC COMMENT

Not applicable

C. DATA ASSESSMENT

Not applicable

D. ASSESSMENT OF PROGRESS

Not applicable

E. STATE MONITOR ADVOCATE

Not applicable

WAGNER-PEYSER ASSURANCES

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	No
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	No
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under	No

The State Plan must include	Include
Title I; and	
4. SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	No

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

A. ALIGNING OF CONTENT STANDARDS

Adult education programs have already adopted the Common Core State Standards into their curriculum and have aligned them with the College and Career Readiness Standards (CCRS) for Adult Education. In addition, adult education faculties have received the CCRS Implementation Training offered for Language Arts and Math as part of their professional development.

Programs measure student level and progress by using standardized assessment tools and by following assessment policy recommendations shared with them on an annual basis. Level gains and workforce skills are recorded using the Comprehensive Adult Student Assessment System (CASAS) TOPs Enterprise (TE) reporting system. The state uses the data provided by TE to analyze and improve performance.

Funds will continue to be used to support professional development opportunities to aid in the implementation of standard-based instruction for adult education in the Northern Mariana Islands.

The Adult Education program has mapped the adopted Common Core State Standards (CCSS) as well as the Adult Education College and Career Readiness Standards (CCRS) into the Student Learning Outcomes (SLOs) that are required in every course syllabus.

B. LOCAL ACTIVITIES

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

The Northern Mariana Islands' Adult Education and Literacy Programs assist adults to become literate and obtain the knowledge and skills necessary to obtain a job or improve in their present jobs, to assist parents to be more involved with the educational development of their children, and to provide the opportunity for educational disadvantaged adults to complete a secondary education or credential.

Under Title II of the Workforce Innovation Opportunity Act (WIOA), eligible individuals are those who:

- has attained 16 years of age;
- is not enrolled or required to be enrolled in secondary school under State law; and who;
- is basic skills deficient;
- does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or
- is an English language learner.

Adult Basic Education (ABE) provides instruction in basic skills for adults with low literacy and numeracy skills. Adult Secondary Education (ASE) provides instruction for adults whose literacy and numeracy skills equate to a high school level and their goals are to obtain a high school equivalency diploma.

English as a Second Language (ESL) provides adults who lack proficiency in English and who seek to improve their literacy and competence in English.

In serving its students, the CNMI ABE program believes that adult learners learn best when:

1. They are in a comfortable with the learning environment and they attempt tasks that allow them to succeed within the contexts of their limited time and demanding lives;
2. They provide input into the planning of their learning goals and processes;

3. They have opportunities to engage in social learning, enabling them to learn from their peers and their instructors;
4. They have a variety of options appropriate to their learning styles and have opportunities to analyze and expand their modes of learning;
5. They are able to associate new learning with previous experiences and to use those experiences while learning;
6. They have an opportunity to apply theory/information to practical situations in their own life; and
7. When the instructors deal with learning difficulties and disabilities tactfully and patiently.

The NMI Adult Basic Education Program has been designed for:

- Non-native speakers of English to improve their conversational, reading, writing and numeracy skills in English;
- Adult students (16 years old and older) who did not complete their high school education, but plan to complete the high school equivalency examinations;
- Returning adult speakers who did not complete their high school education to prepare to take the high school equivalency examination;
- Adult literacy students to improve their basic reading, writing, and/or mathematics skill(s);
- Adults to be prepared for successful job placement, career training or career performance; and
- Adults who are parents preparing to become effective first teachers of their children. The performance measures for ABE programs are outlined in the Workforce Innovation Opportunity Act, Title II, Adult Basic Education and Family Literacy.

The ABE curriculum will integrate skills, which includes digital literacy, critical thinking, and college and career readiness skills. These skills will assist students in improving educational levels and successfully continuing education or training and entering employment.

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

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

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

- Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
- Is for the purpose of educational and career advancement.

The Adult Education Office under Subtitle C- Local Provision, Sec. 231 will make funds available for eligible competing agencies and these agencies shall consider the 13 considerations listed in Sec. 231 (e).

The Adult Education Office shall award two-year grants or contracts, on a competitive basis, to eligible providers within the state to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the state. Each eligible provider receiving a grant or contract under subsection (a) uses the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. Approved activities are the 8 listed in Sec. 203 of WIOA.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

The CNMI State Department of Corrections (DOC) houses individuals remanded into their custody from the main island of Saipan and its two sister islands, Rota and Tinian, and at times from its smaller minimally populated northern island chain. The Department of Correction has been a partner with adult education and family literacy programs for many years. DOC has made some changes to prioritize providing educational and career training to their incarcerated individuals. Priority has been set to those who are likely to leave the institution within five years of participation in the adult education program.

For those who meet the eligibility requirements, the program will offer adult education and literacy activities. The instruction offered may integrate life skills, employability skills, and digital literacy skills to help the inmates obtain the needed skills to become self-reliant and contributing members of the island community after leaving DOC.

Currently there are no funding opportunities to provide adult education programs outside of AEFLA. The local program has included instruction and employability skills to DOC inmates. These inmate students must lack mastery in basic skills or have not obtained a high school diploma or its equivalent.

The Adult Education State Office will run competitions, that adhere to Sec. 231, for eligible providers and from funds made available under section 222(a)(1) for a fiscal year, each eligible agency shall carry out corrections education and education for other institutionalized individuals. The funds described in subsection (a) shall be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including academic programs for— (1) adult education and literacy activities; (2) special education, as determined by the eligible agency; (3) secondary school credit; (4) integrated education and training; (5) career pathways; (6) concurrent enrollment; (7) peer tutoring; and (8) transition to re-entry initiatives and other post-release services with the goal of reducing recidivism. Each eligible agency that is using assistance provided under this section to carry out a program for criminal offenders within a correctional institution shall give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program. In addition to any report required under section 116, each eligible agency that receives assistance provided under this section shall annually prepare and submit to the Secretary a report on the progress, as described in section 116, of the eligible agency with respect to the programs and activities carried out under this section, including the relative rate of recidivism for the criminal offenders served.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Funding for Integrated English Literacy and Civics Education is not available for the CNMI.

E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA

CNMI's Adult Education Office provides activities such as professional development opportunities; alignment of curriculum with standards and competencies that incorporate 21st-century skills, workplace readiness activities with academic and life skill courses; providing technical assistance, which includes staff training, program management improvement, and support; working with other partner agencies to increase enrollment and completion rates in adult education programs, and partnering with postsecondary institutions.

The Adult Education Office will use the funds for required State Leadership activities as follows:

- align with core partners and one-stop partners to support the strategies of its Unified State Plan, including the development of career pathways by completing training for the Virtual One-Stop System (VOS) this October 2022. Planning is underway to implement and integrate with core partners as soon as possible when the system is in place.
- improve instruction by developing high-quality professional development programs that will include elements of reading instruction, dissemination of model programs and promising practices, and participating in training available via online formats or attending in-person.
- provides technical assistance to providers based on researched evidence-based instructional practices, responsibilities of one-stop programs, effective use of technology, and
- monitoring and evaluating the quality of adult education activities in the CNMI every six months to make sure services and instruction are on track or if improvements need to be conducted.

Adult Education will use State Leadership funds for technical assistance to support local programs with programs, activities, and curricula. The technical assistance will focus on data systems, assessment, integrated education and training, digital literacy activities, and career readiness and pathways.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

The CNMI's Adult Education Office will be responsible in carrying out permissible State Leadership activities, if funding permits, by:

- maintaining membership and partnership in the Literacy Information and Communication System (LINCS) in order to collaborate with other fellow agencies and minimize duplication of effort,
- furthering work on standards implementation, including the use of aligned and approved assessments to improve student preparedness for college and the workforce as a result of their participation in Adult Education and Literacy programs,
- improving assistance to adult learners to effectively meet personal and program goals,
- providing assistance to eligible providers in meeting adjusted levels of performance, via technical assistance, site visits, ongoing communications, and targeted professional development and program improvement activities,

- offering proven program models and content for integrated education and training and career pathways, and
- requiring evaluations of AEFLA programs every four years

F. ASSESSING QUALITY

The CNMI's Adult Education Office will visit programs to discuss program management, professional development needs, performance data, and program compliance. If needed, specific training will ensure that proven and evidence-based educational and student support models are being applied in the classroom. Monitoring site visits will be conducted with programs that are identified needing strategies for the improvement of programs. With guidance from the Adult Education office, technical assistance will be given and will assist programs in developing an improvement plan. The Office will monitor the program closely and will conduct follow-up site visits to certify improvement plans are executed. Site visits may include classroom observations, and student surveys or evaluations. Monitoring examples may include financial, program management, data integrity, and teacher quality. All monitoring activities will result in a detailed compliance letter itemizing findings, recommendations, and commendations based on the implementation of the improvement plan and policy.

For ongoing assessment purposes, the Adult Education Office will require all programs to submit ongoing data that denote student participation levels and weekly attendance. Data submitted must also track student outcomes in the areas of obtaining or retaining employment, as well as transitioning into postsecondary education or training. Under WIOA, the Office will partner with the State Department of Labor (DOL) to track and report employment follow-up required in the new legislation.

The Adult Education Office assesses the quality of its professional development programs by conducting an assessment and surveys on needs, services, and data. Programs will then create an action plan for planning professional development to address deficiencies or necessary improvements by outlining their strategies and activities. The Adult Education Office participates in program review under the Northern Marianas College Academic Programs and Services (APS) Division.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has	Yes

The State Plan must include	Include
authority to submit the plan;	
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

AUTHORIZING OR CERTIFYING REPRESENTATIVE

APPLICANT'S ORGANIZATION	Enter information in this column
Applicant's Organization	Northern Marianas College

PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
First Name	Galvin
Last Name	Deleon Guerrero
Title	President
Email	galvin.deleonguerrero@marianas.edu

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

The Adult State Office will include GEPA language in the Information, Narrative, and Application Checklist Section of the RFP. A GEPA Attestation Statement Form will be included in the RFP package for eligible providers to describe in detail how they will comply with the GEPA requirements.

Adherence to each agency's GEPA statement is monitored on a regular basis through quarterly desk audits and on-site review and technical assistance visits. Programs are reviewed to ensure equitable access to, and participation in all of its AFELA programs by eligible students, teachers, and program beneficiaries with special needs. Monitoring includes, but is not limited to, disaggregated review of enrollment data, intake processes, hiring practices, etc.

Northern Marianas College is committed to the principle of equal opportunity in education. The College prohibits discrimination, including harassment, on the basis of race, gender, age, religion, color, national origin, ancestry, sexual orientation, marital status, disability, veteran status, or any other unlawful basis. This policy covers academic considerations such as admission and access to, and participation and treatment in, the College's programs, activities, and services.

Applicants of the WIOA Title II funding will engage in provisions such as extended seat time, use of large-print materials and tests, and admission into the Adult Basic Education program. Furthermore, the applicants will:

1. Assess the special needs of individuals requiring accommodations and ensure that the campus' facilities for individuals with physical impairments allow access to the building, classrooms, and restrooms.
2. The Counselor or designee will serve as the counselor for students with special needs and will assist with the planning for the individuals with special learning needs and for coordinating the delivery of appropriate educational services at each campus.
3. Assess the academic level of each student to ensure proper placement and provide reasonable accommodations as a part of the enrollment process at each campus or site. Administer the CASAS as appropriate for each participant utilizing the state assessment policy as a reference if needed.
4. The State Office will establish a data collection and data entry process to ensure that any student who meets the NRS definition of Disabled is accurately reflected in the data.
5. Advisors or designee will direct students to the HiSET Administrator for special accommodations for HiSET test. Once approved, the testing center examiners will ensure that these accommodations are made available to the examinee. (Refer to HiSET policy regarding accommodations for exams and the process for requesting accommodations.)
6. Make available a brochure regarding program offerings on campus and sites.

7. When appropriate, refer students to the Office of Vocational Rehabilitation if they are interested and meet the requirements of the program.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	57.0%	57.0%	58.0%	58.0%
Employment (Fourth Quarter After Exit)	60.0%	60.0%	61.0%	61.0%
Median Earnings (Second Quarter After Exit)	\$4,153.00	4,161.00	\$4,153.00	4,162.00
Credential Attainment Rate	81.0%	50.0%	82.0%	51.0%
Measurable Skill Gains	50.0%	43.0%	51.0%	44.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

A. INPUT OF STATE REHABILITATION COUNCIL

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;

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

OFFICE OF VOCATIONAL REHABILITATION

2020-2023 STATE PLAN

Office of Vocational Rehabilitation Executive Summary

The Commonwealth of the Northern Mariana Islands (CNMI), Office of Vocational Rehabilitation (OVR) portion of the Unified State Plan is submitted to the Rehabilitation Services Administration (RSA) of the U.S. Department of Education (DOE) to describe the vocational rehabilitation and supported employment services provided to CNMI residents with disabilities under Title I and Title VI, Part B of the Rehabilitation Act of 1973, as amended. As a core partner in the CNMI workforce development system as identified in the 2014 Workforce Innovation and Opportunity Act (WIOA), OVR's State Plan is an Appendix to the CNMI's Unified State Plan,

which is submitted every four years through the CNMI Statewide Workforce Development Board (SWDB) and CNMI Department of Labor. A comprehensive review of the current State Plan covering program years 2020-2023 resulted in modifications to several descriptions, namely:

(a) Input of State Rehabilitation Council

(i) Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

(k) Annual Estimates

(n) Goals and Plans for Distribution of Title VI Funds

(o) State's Strategies

(p) Evaluation and Reports of Progress: VR Goals

The 2020-2023 VR State Plan was developed in collaboration between the Office of Vocational Rehabilitation and the State Rehabilitation Council (SRC) and incorporated some of the findings and recommendations from the Program's most recent Comprehensive Statewide Needs Assessment (CSNA) that continue to be relevant to the State Plan. The triennial CSNA will be conducted in FY 2020.

The WIOA implementation continues to require significant changes to the OVR and supported employment programs with prominence being placed on transition services to youth and students with disabilities, business/employer engagement, program partnerships, and competitive integrated employment. The VR State Plan, demonstrates the Program's commitment to the empowerment of individuals, and to maximizing their employability, independence, and integration into the workplace and community.

KEY PRIORITIES

The SRC and OVR jointly developed the key priorities and goals to ensure the alignment with WIOA and include transition services for qualified youth and students with disabilities, business engagement, program partnerships and increasing competitive integrated employment. To this, the following key priorities and goals identified are:

Priority 1: Transition and Pre-Employment Transition Services (PreETS)

Goal: Full implementation of pre-employment transition services through the realignment of staff and service delivery methods.

Goal: Expand and improve the CNMI's service delivery infrastructure and the Program's capacity for making available PreETS to students with disabilities in need of such services by utilizing pre-employment transition services Authorized and Coordination Activities.

Priority 2: Business/Employer Engagement

Goal: Increase partnerships with local businesses to develop or expand work experiences through on-the-job and work experience training, internship/ apprenticeship, and employment opportunities for qualified adults and youth with disabilities.

Goal: Develop systems capacity, knowledge and skills to effectively meet the needs of businesses/employers.

Priority 3: Competitive Integrated Employment

Goal: Increase competitive integrated employment opportunities, supports and outcomes for adults and youth with disabilities, particularly those with the most significant disabilities.

Priority 4: Agency Performance

Goal: Improve overall Agency performance

The OVR, along with the Disabilities Network Partners (DNP), service providers and partners in the local public agencies, provides the VR services to applicants and eligible consumers. To date, the CNMI has one CRP in operation, which has created a challenge for the program. The program has been working to increase its service delivery capacity by filling and creating much needed positions to ensure the provision of services. Federal and State local funds are used to provide a broad range of VR services, which include counseling and guidance; assessment, training, and education; transportation; mobility/auxiliary aids; job search and placement; job acquisition/retention services; post-employment services; and, accommodations connected to the consumer's vocational goal.

The implementation of the Unified State Plan is the collective efforts of the Statewide Workforce Development Board, OVR, SRC, WIOA core partners, the DNP, and community programs to work towards the common goals and outcomes. The VR State Plan is the program's roadmap to achieve OVR's mission to increase employment and promote independence of eligible individuals with disabilities residing in the Commonwealth of the Northern Mariana Islands

Program-Specific Requirements for Vocational Rehabilitation

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

** Sec. 102(b)(D)(iii) of WIOA*

a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

The CNMI State Rehabilitation Council has been working with OVR on various issues, such as regulatory reforms, pre-employment transition services, business engagement and competitive integrated employment. The SRC has been keeping abreast of program issues and activities through its quarterly and committee meetings.

The SRC jointly reviewed, developed and agreed to the program's priority goals in the VR portion of the Unified State Plan for the next four years. As of March 07, 2022, there were no further recommendations by the State Rehabilitation Council.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

Please refer to Section A-1 for statement.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

Not Applicable

B. REQUEST FOR WAIVER OF STATEWIDENESS

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

The CNMI Office of Vocational Rehabilitation has not requested a waiver.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not applicable.

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Not Applicable

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

The CNMI OVR continues with its efforts to maintain or develop cooperative arrangements or agreements with various local, State, and Federal agencies and entities for referrals, training, services, facilities utilization, potential cost-sharing, and advocacy activities. These agencies include:

- *State Rehabilitation Council* for information/referral; outreach to increase education/awareness; collaboration/coordination and support for activities sponsored by the Disability Network Partners including the Transition Coalition; program review and evaluation including guidance on effective strategies to improve services and overall VR agency performance; employer engagement through Council-sponsored Employer Forum during all general membership meetings; etc.
- *Statewide Independent Living Council* for information/referral, peer counseling, IL skills training, advocacy, transition services (transition from nursing homes and other institutions to community-based residences; assisting individuals to avoid institutional placement; and transition of youth with significant disabilities after completion of secondary education to postsecondary life), and transportation services).
- *CNMI Council on Developmental Disabilities* for systemic change, public policy development, advocacy, empowerment training including self-advocacy, identification of barriers to employment and community inclusion for individuals with developmental and other disabilities, referral services, and collaboration and coordination with public education, Medicaid, and self-advocates, and awareness activities during Developmental Disabilities and Employment Awareness Month and/or other disability-related awareness activities throughout the year.
- Assistive Technology Program for device short-term loan, device re-utilization, device demonstration, and trainings (e.g., software, communications tools, etc.)
- *Commonwealth Healthcare Corporation*:
- Transitional Living Center for Work Experience Training for OVR and CGC's mutual consumers and Day Treatment Program to help increase function and independence.
- Non-Communicable Disease Bureau (NCDB) for information/referral, public education and awareness, advocacy, and training assistance.

- Children with Special Health Care Needs Program for care coordination of services to target group between birth and 21 years old.
- Community Guidance Center (CGC) for referral of rehabilitation services and increased collaboration/coordination of mutual clients to ensure meeting their employment and rehabilitation needs.
- Maternal and Child Health Bureau for the promotion of health and wellness of women, infants, children (including children with special healthcare needs), adolescents and their families; cost-sharing of DNP-sponsored activities; information/referral; and outreach to increase education and awareness.
- CNMI Medicaid Office for cost-sharing arrangements for services provided and referrals. Though a Memorandum of Understanding (MOU) with Medicaid exists, a current review may be required.
- Medical Referral Services Office (Rota and Tinian Centers, Guam, Hawaii, etc.) for service coordination; logistical support; exploration of and utilization of comparable services/benefits; cost-sharing for provision of off-island medical services referral to mutual consumers.
- Behavioral and Mental Health Planning Council for program information and data sharing; referrals; participation in activities related to improving the service needs of mutual mental health participants that OVR may invited to; etc.
- *Office of the Governor:*
 - *Scholarship Office* for educational financial assistance at the Northern Marianas College and other institutions of higher education (IHE), referral of students to OVR for assistance and internships, and job/career exploration including information on rehabilitation careers.
 - Office of the Special Assistant for Administration for WET and OJT placements, information/referral, disability employment awareness, etc.
 - Carolinian Affairs Office for referrals and outreach and collaboration/coordination for the translation of VR program materials in the Carolinian vernacular, if needed.
 - Indigenous Affairs Office for referrals and outreach and collaboration/coordination for the translation of VR program materials in the Chamorro vernacular, if needed.
 - Veteran's Affairs Office to assist in the coordination of services for common consumers and delivery of quality services for qualified disabled veterans.
- *Northern Marianas College:*
 - The University Center for Excellence in Developmental Disabilities for faculty, student, and family training and advocacy, accommodations, increased awareness and empowerment in the postsecondary setting, and referral services.
 - Counseling Office, Disability Support Services for referrals, sensitivity training, transition, accommodation assistance, financial aid counseling, and counseling on postsecondary educational opportunities.
 - Adult Education and Literacy Program for educational and job skill training and referral services.
 - Postsecondary Supports Pilot Project for information/referral; pre-employment transition services related to counseling on postsecondary options and instructions in

self-advocacy; collaboration and coordination related to student accommodation; and individualized supports to students with disabilities.

- *Department of Community and Cultural Affairs:*
- Office on Aging which provides information & referral; transportation services as well as the coordination of the Older Americans Awareness Month activities in May; and Senior Community Service Employment Program for subsidized part-time employment opportunities for low income individuals aged 55 years and older.
- Division of Youth Services for referrals and assistance on outreach.
- Nutrition Assistance Program for referrals and food assistance.
- Low Income Home Energy Assistance Program for assistance, utility subsidies and referral services.
- Child Care Program to assist individuals with disabilities and low income families to pay for child care while working, attending school or training.
- *Saipan Chamber of Commerce* for sponsorship of employers' training and education, mentoring & jobsite training, and referral services (employment engagement).
- *Society for Human Resource Management and Rotary Club* for employer engagement:
- Information, referral and advocacy
- Employer awareness and education
- Collaboration with OVR for Work Experience (WE) and On-the-Job Training (OJT) placements
- *Northern Marianas Protection and Advocacy Systems, Inc.* for advocacy training, seminars, workshops, referrals, and cost-sharing of activities including National Developmental Disabilities and Employment Awareness Month (DDEAM).
- *CNMI Center for Living Independently* for advocacy and IL skills training, information/referral, peer counseling, transition, and transportation.
- *Mayors' Offices of Saipan, Tinian, and Rota* for referrals, outreach, program support services and coordination, and utility subsidies payment, and collaboration on consumer trainings.
- *Karidat* for temporary housing, maintenance expenses, food and clothing assistance, and referral services.
- Commonwealth Office on Transit Authority (COTA) for transportation services, public education and awareness, and information & referral services.
- *CNMI WIOA Core Programs* through the *State Workforce Development Board* for leveraging of resource and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data sharing, collaboration/coordination with respect to the American Job Center (aka One-Stop), and other authorized activities per WIOA.
- *Disability Network Partners* for ongoing discussions about issues affecting the disability community in the CNMI, information sharing, cost-sharing on disability awareness as well as employer engagement activities and training opportunities, referrals, technical assistance, etc.

- *CNMI Transition Coalition* for improved collaboration and coordination aimed at improving school to work transition services and preparing students with disabilities for the 21st century workforce through the provision of pre-employment transition services (Pre-ETS).
- *Department of Corrections / Division of Youth Services* in developing a collaborative relationship with the Department of Corrections (DOC) and the Division of Youth Services (DYS) to coordinate service activities for individuals with disabilities who are interacting with the juvenile justice system, child welfare as well as adults scheduled for release. OVR will work with DOC in assisting inmates with disabilities with determining if they are eligible for OVR services. If found eligible, helping them to prepare for a successful employment transition as a component of their parole process.
- Public School System:
- *Special Education Program* for referrals and the coordination and collaboration of the provision of pre-employment transition services to students with disabilities as defined by WIOA and possible AT acquisition of school-funded devices for OVR participants who will be exiting the secondary school system. (Note: Current PSS practice mandates the retrieval of any and all assistive equipment and devices purchased for students with disabilities after graduation. In some instances, these ATs are necessary tools for the student to continue being successful post high school whether they choose to pursue college, employment, and/or independent living. Therefore, for an OVR participant, OVR may purchase the AT from PSS at a depreciated value in order for the participant to reach his/her vocational goal.)
- Special Education State Advisory Panel for program information and data sharing; referrals; participation in activities related to improving the service needs of students with disabilities that OVR may be invited to; etc.
- Cooperative Education and Training Program to assist students in exploring career options and providing real-life integrated on-the-job training in the areas of their interest and choice; information/referral; outreach; collaboration & coordination efforts; etc.
- *Office of U.S. Congressman Gregorio Kilili Sablan* for information/referral; outreach to increase education/awareness; participation in the annual Veterans Resource Fair sponsored by Cong. Sablan's Office.
- *Northern Marianas Technical Institute* for consumer training, job preparation, and placement; information/referral; outreach to increase education/awareness; support for and provision of student accommodation.
- *The Lady Diann Torres Foundation* Disability Center for information/referral; outreach to increase education/awareness; provision of training to individuals with disabilities to increase employability; provision of training to other community stakeholders including service providers, employers, the DNP, etc. to increase knowledge and capacities around disability employment.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

- The CNMI Assistive Technology Program is a federally-funded program under the CNMI Council on Developmental Disabilities and authorized under the Assistive Technology Act of 1998. In 1994, the CNMI Council on Developmental Disabilities was funded to

develop, implement, and administer a Commonwealth-wide program to meet the assistive technology needs of persons with disabilities, which was known as STRAID. However, as a result of the new requirements of the Assistive Technology Act of 1998, as amended, the program is now called the CNMI Assistive Technology Program (CNMI ATP), which is under the CNMI Council on Developmental Disabilities. The CNMI ATP provides assistive technology-related services CNMI-wide to help children and adults with disabilities live productive, independent, and good quality lives. As an AT Act program, CNMI ATP carries out state level and leadership activities. State level activities consist of, Device Reutilization Program, Device Loan Program and Device Demonstration Program. Furthermore, CNMI ATP conducts state leadership activities CNMI-wide such as training, technical assistance, public awareness and outreach, information dissemination and referrals, and coordination and collaboration with various public, private and non-government entities.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

The CNMI OVR does not currently have cooperative agreements with any programs funded under the USDA.

But, as previously stated, the OVR will, when appropriate, continue to develop agreements with other state and local agencies that are not part of the statewide workforce investment system, including programs carried out by the Under Secretary for Rural Development of the Department of Agriculture and State programs, when such agreements will benefit the vocational rehabilitation of persons with significant disabilities.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

- Workforce Investment Agency (WIOA Title I Program) for leveraging of resources and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data sharing, collaboration/coordination with respect to the American Job Center (aka One-Stop), and other authorized activities per WIOA.
- Continue to maintain and strengthen relationships with the Northern Marianas Technical Institute for continued referrals of VR clients to NMTech for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the technical school in the area of reasonable accommodation and effective communication with individuals with varying disabilities.
- Latte Training Academy for workforce development providing skilled and certified (Allied Health, Hotel & Hospitality, Business, and Information Technology) vocational training and career enhancement.
- Island Training Solutions for practicable ready to use training for public and private sector staff and management in Customer Service Team Building, Problem Solving, etc.
- Various OVR-approved vendors providing pre-employment and work preparation training and services to out-of-school youth.

5. STATE USE CONTRACTING PROGRAMS.

Not Applicable.

D. COORDINATION WITH EDUCATION OFFICIALS

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 VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

1. DSU's plans

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

Section 20 of OVR's Policy and Procedures Manual states: "The Rehabilitation Act of 1973, as amended, requires the development of cooperative agreements, formal interagency agreements and memorandums of understanding, as appropriate, with other public agencies (CFR 361.22, CFR 361.23, 361.24). The cooperative agreement is designed for use whenever public agencies enter into agreements and does not involve an exchange of funds. This may be accomplished by executing a COOPERATIVE AGREEMENT BETWEEN PUBLIC AGENCIES, and obtaining required signatory approvals. The Rehabilitation Act of 1973, as amended, also allows for third-party cooperative arrangements (CFR 361.28). Interlocal contracts with public agencies may be entered into by executing an INTERLOCAL CONTRACT BETWEEN PUBLIC AGENCIES and obtaining required signatory approvals. The interlocal contract is designed for use whenever public agencies contract with one another for the performance of any government service" (p. 78).

Where specifically School-to-Work Transition is concerned, the CNMI Office of Vocational Rehabilitation (OVR) and the Public School System-Special Education Program (PSS-SPED), in FY 2018, re-evaluated their existing Interagency Cooperative Agreement (ICA) and made necessary revisions per the requirements of the Workforce Innovation and Opportunity Act (WIOA) of 2014. Section 8 of the ICA talks about Pre-Employment Transition Services: "The Rehabilitation Act of 2014, as amended (under Title IV of the Workforce Innovation and Opportunity Act signed into law by President Obama on July 22, 2014) requires OVR to provide eligible students with disabilities under IDEA or Section 504, ages 16-21 years, with pre-employment transition services (Pre-ETS), such as: Job exploration counseling, Work-based learning experience, Counseling on comprehensive training or post-secondary educational opportunities, Workplace readiness training, and independent living skills Instructions in self-advocacy. PSS-SpEd will provide assistance to OVR in the coordination with employers on transition services including Pre-ETS for students with disabilities" (p. 3).

Procedures regarding the timely development and approval of individualized plans for employment for all CNMI OVR consumers, including students with disabilities who are deemed eligible and are at the appropriate age to prepare for transition may be found in the Policy and Procedures Manual, under Section 16: INDIVIDUALIZED PLAN FOR EMPLOYMENT (IPE): "After determination of eligibility, Counselor shall develop an individualized plan for employment (IPE) within 60 work days, and the identification of rehabilitation needs, there will be an IPE initiated" (p. 35). In addition to the ICA, the School-to-Work Transition Guidelines provides more practical information including best practices for delivering transition services. According to the Guidelines, the CNMI OVR must ensure that the "Individualized Plan for Employment (IPE) should be completed as soon as eligibility has been determined but no later than 60 days, and the necessary information has been gathered. An IPE should be in place prior to graduation

or exit from school. The IPE is to be coordinated with the student's Individual Education Program (IEP) that is developed by the school system's transition team" (p. 2).

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

Section 3 of the Interagency Cooperative Agreement states that the "OVR and PSS-SpEd will engage in providing the other with consultation and technical assistance to plan for and ensure the smooth transition of students with disabilities" (p. 2).

VR staff are essentially a resource for schools and families to help educate students about supports needed for a smooth transition from school to work, further training, education and/or independent living. To achieve this objective, the following general activities are completed:

- Consulting with and educating schools, parents, students, and other agencies about VR services.
- Conducting outreach that includes VR orientation presentations, dissemination of VR brochures, and technical assistance during transition IEP planning.
- Participation in transition fairs, job fairs, and other activities targeting parents and students to increase appropriate referrals.
- Conducting early identification and assessment of student needs for transition services.
- Bringing the VR program to the school campuses through continued co-location efforts.
- Communicating relevant VR policy which may impact a student's application or eligibility for VR services.
- Ensuring the accessible availability of the VR staff to provide consultation and appropriate counseling services to students and parents who are inquiring about VR Services.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

Section 3 of the Interagency Cooperative Agreement states that the "OVR's involvement during the transition planning phase of the IEP helps to ensure that the vocational or employment-related provisions of the IEP provide a bridge to the vocational rehabilitation services needed under an IPE for those students determined eligible for the vocational rehabilitation program" (p. 1).

As an extension of the 2018 Interagency Agreement between the Office of Vocational Rehabilitation and the Public School System-Special Education Program, the School to Work Transition Guide (SWTG) was developed to ensure a smooth transition process. This guide suggests best practices that can be used as a tool to assist in the improvement of communication, coordination, and services for students with disabilities transitioning from school to work. It was designed to be useful for all persons and agencies (stakeholders) involved in the transition process. This document varies depending upon the stakeholder's needs at the time of use. The Agencies and Programs involved in the development of this guide agreed to the following core values:

- **Transition is Essential:** Transition is important for all students, regardless of disability. Transition provides the focus and early planning for all youth with disabilities to move towards achieving their goals.
- **Individualization:** Transition services are not the same for all students. Services are person-specific and developed with the young adult, their family, and those who know them well based on their interests, abilities, and needs.
- **Outcome Focused:** Transition services are specific outcomes driven activities designed to help students achieve their goals of training/education, employment, and independent living.
- **Achieve More Together:** Working together, as equal partners, creates a seamless transition from school to work. All can assist the student and their families identify their needs and develop plans to meet these needs. Everyone has something to contribute and leveraging of funds and staff leads to exceptional outcomes.
- **Student and Family Involvement:** Students and their families are actively involved in the entire transition process including service decisions. They are full and meaningful partners in the process.
- **Identification of Roles and Process:** Identifying the roles of every partner and the processes needed, sets clear expectations between partners about areas of focus and expertise, responsibilities, and where to go for assistance beyond the individual programs scope of practice. Knowing where to go for the right answers allows for smooth discussions about possibilities.
- **Increase Understanding and Transparency:** Share information so all partners are aware of available resources to help in transitioning.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Reference: An Interagency Cooperative Agreement Between The Office of Vocational Rehabilitation (OVR) And The Public School System-Special Education Program (PSS-SPED) April 02, 2018.

Section 10 - Mutual Responsibilities

- **Training and Technical Assistance:** OVR will provide consultation and technical assistance to PSS-SpEd that will assist in the planning and transition of all students with disabilities who are eligible or potentially eligible from school to post-school activities, including employment. Develop and provide common training and professional development opportunities to improve transition and employment results to youth.
- **Data Sharing:** Sharing of data, within the bounds of confidentiality, of eligible students regarding transition services and outcomes.
- **Transition Services/Accommodations:** Identify and disseminate information about pre-employment transition services and transition services, accommodations, employment services, effective practices/strategies that create positive employment outcomes to program staff, partners, families, individuals, employers, and public and private stakeholders.
- **Assistive Technology:** Upon completion of the free appropriate public education (FAPE) of many eligible students, PSS-SpEd is left with items of assistive technology which have been required by student's IEPs and which have been customized for particular students

or are otherwise unlikely to be used by different students. Such items of assistive technology often are stored until they become obsolete.

- Co-Location Initiative: Parties agree to continue to lend their support for OVR staff, i.e., vocational rehabilitation counselor, to be based at the public high schools for a rehabilitation program, conduct Q&A with stakeholders, i.e. students, parents, and school personnel, entertain applications for vocational rehabilitation services, conduct initial interviews, and increase referrals to OVR.

Section 11 of this document describes further the roles and responsibilities for each agency as applicable to their regulatory authority.

Section 12 - Financial Responsibility of the Interagency Cooperative Agreement States: When a student with a disability is both in school and has an IPE with OVR, the cost of services necessary for both the student's education and for the student to become employed, will be delineated between PSS-SpEd in terms of what will work with PSS-SpEd representative in determining which is needed to complete high school coursework and which services pertain to fulfilling the IPE.

When another adult service provider agency has been identified by the IEP team (that can pay part or all of the cost of a specific service or device), a representative of that agency shall be invited and included in the IEP meeting where the responsibility for payment is negotiated. Arrangements to share the cost of a given service or device will be fully reflected and explained in the IEP or the IPE, or both. (Note: OVR is a secondary source of financial assistance.

Section 4 - Transition Planning Related to the Individualized Education Program (IEP): Schools usually designate a staff person as a Transition IEP Coordinator. This person is responsible for communicating the student's transition services needs to agencies representatives who were unable to attend. For CNMIPSS-SpEd, responsibility for the coordination of transition services is transferred to the school level and falls within the purview of SPED teachers.

The school must obtain agency commitments to provide or pay for needed transition services or reconvene the IEP to determine alternate methods for meeting the student's needs. It is important to the VR Staff to respond to school staff on the progress of mutual students, with appropriate parental, legal guardian, or student (at age 18) consent.

*The CNMI Department of Labor historically and to date, does not issue special wage certificates or licenses under Section 14(c) of the Fair Labor Standards Act to entities. As there are no entities that hire with sub-minimum wages the Office of Vocational Rehabilitation and the CNMI Public School System mutually agreed to not include it in their Memorandum of Understanding.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

Reference: An Interagency Cooperative Agreement Between The Office of Vocational Rehabilitation (OVR) And The Public School System-Special Education Program (PSS-SPED)

Section 5 - Procedures for Outreach - OVR and PSS-SpEd will continue to support outreach activities that will increase referrals to OVR in an effort to provide eligible students with disabilities a smooth school to work transition. (Refer to the School to Work Transition Guidelines for detailed description on procedures for outreach.)

Outreach activities of the VR Counselor are primarily focused on providing information about VR to school staff, students, parents, community professionals, and others interested in pre-employment transition services and transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the following:

- Vocational Rehabilitation program purpose
- Eligibility requirements
- Procedures
- Scope of services that may be provided to eligible students
- Pre-employment transition services that may be provided to potentially eligible students

The VR Staff can provide information regarding OVR services that can be passed on to students and their families by contacting the SPED Teacher, Transition Coordinator, SPED Coordinator, or School Counselor. Ways the VR Counselor may conduct outreach include:

- Providing VR brochures and business cards to the school
- Presenting at the Open House or Orientation held at the school
- Conducting regularly scheduled school visits (co—location)
- Participating in Transition and job fairs at the school
- Attending school IEP meetings when invited
- Speaking about pre-employment transition services and VR services at school staff meetings, teacher in—service training, student/parent group meetings, or interagency meetings and other events in which OVR is invited to conduct an outreach presentation.

The VR Staff should work with school staff to ensure referrals of students with disabilities to the OVR program at the beginning of the school year as follows:

- Referral for pre-employment transition services beginning at age 16 for all students with disabilities who may need them
- Referral and application for OVR services is recommended at age 16 for students who are involved in or plan to be involved in Community-Based Work Experiences (CBWE)
- Although OVR does not impose an age limit on when a student can apply for VR Transition services, they encourage students to do so two years prior to school exit
- Students at high risk of dropping out should be referred if they are old enough to begin training or searching for employment
- The VR Staff may act in an advisory capacity for at—risk youth who are too young to apply and/or do not have a disability

This should allow sufficient time for determining eligibility, identifying OVR service needs, referring students to community services, and developing the approve IPE prior to the student's exit from school.

Section 8 - Services Prior to Referral Transition services, including pre-employment transition services, may be provided by OVR to students with disabilities beginning at age 16 (or younger, if the IEP team determines it is appropriate), who have not yet applied for VR services. Consultation to students and families, technical assistance to schools, and participation in IEP meetings when invited.

OVR will collaborate with PSS-SpEd to provide any or all of the five pre-employment transition services required activities described in the next section to students with disabilities (ages 16-21, or younger, if the IEP team determines it is appropriate).

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

There are currently no private non-profits providing vocational rehabilitation services in the CNMI.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

OVR continues to negotiate with a potential vendor qualified to provide job coaching services through a fee for service arrangement. In the interim, however, OVR's Employment Specialist will provide this much needed service to the consumers on an as needed basis. The job coaches assist individuals with most significant disabilities during their participation in the work experience and/or on-the-job training programs. When necessary, the services of a job coach is procured to assist newly-hired consumers to ease their transition into employment.

Personal assistance services are provided to consumers with most significant disabilities to help them to further maintain their employment through the choosing of their own PAs. A family member may agree to provide the consumer with personal assistance services in an effort to fully maximize family support as a comparable benefit. If that is not feasible, OVR may compensate the family member with a stipend. Marianas Health and RJ Corporation so far are the only vendors providing personal assistance services through a fee for service agreement with OVR.

The CNMI continues to have a very limited number of community rehabilitation programs (CRP), supported employment and extended service providers. This creates challenges in providing for comprehensive support services, which are required for a successful program. Discussions with public agencies and organizations to provide and/or fund supported employment and extended services are ongoing. In addition, CNMI OVR will continue to identify individuals who have received training to provide supported employment services to VR consumers. Consorted efforts continue in the recruiting of retired special education teachers to provide job coaching services. (Note: On February 4, 2022, the Marianas Variety reported U.S. Sen. Mazie Hironi as stating: "Listening to your [CNMI government representative] testimonies and the high cost of everything in the territories, I realize that a lot of the federal programs are administered differently or treated differently with regards to your territories, but one that I'm particularly interested in is how Medicaid is treated then, that you have a cap, because I believe that access to healthcare is a right, not a privilege, and so the fact that we have a cap placed on all of you in terms of Medicaid is something that I am going to look at... It will probably help all of you to have us lift that cap." Should the federal government lift the Medicaid cap for the territories including the CNMI, OVR anticipates the provision of additional extended services to consumers with the most significant disabilities.)

G. COORDINATION WITH EMPLOYERS

1. VR SERVICES; AND

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate VR services for consumers with disabilities to prepare them for employment by:

- Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs as well as share OVR's success stories to offer greater awareness of disability inclusion and integration in the workplace.
- Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management (SHRM), Rotary Club, Hotel Association of the Northern Mariana Islands (HANMI) and other similar venues,

- Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor, to help facilitate employer engagement activities and gauge effectiveness,
- Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment,
- Participate in job/career fairs sponsored by various partners within our community, including but not limited to Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,
- Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,
- Work with our Disability Network Partners to consider inclusion of a few employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment,
- Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies,
- Provide professional development and support to the Employment Specialist, whose duties and responsibilities revolve around business relations and employer engagement,
- The SRC general membership meetings will provide an opportunity to listen to and/or address employer or business concerns via the Employer Forum segment of the agenda. This practice started in PY 2017 during the Council's 12/21/17 general membership meeting and will continue for all subsequent regular meetings.
- Actively address employers' training needs in the areas of disability inclusion, accessibility, accommodations, tax incentives, sensitivity and disability awareness, assistive technology, etc.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate Transition services, including Pre-Employment Transition Services (Pre-ETS) for students with disabilities to prepare them for employment by:

- Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs, and what opportunities could be available to PreETS, especially with regards to Work-Based Learning Experiences (WBLE) and transitioning students,
- Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management Rotary Club, and/or other similar venues,
- Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor, to help facilitate employer engagement activities and gauge effectiveness,
- Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment as well as WBLE opportunities,

- Participate in job/career fairs (for consumer or student support) sponsored by various partners within our community, including but not limited to: Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,
- Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,
- Work with our Disability Network Partners to consider inclusion of employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment as well as for Pre-Employment Transition Services (i.e. WBLE/OJT/Apprenticeship Programs)
- Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies, as well as advertising through their social media platforms,
- Ensuring proper supports and training for the Employment Specialist whose duties and responsibilities revolve around business relations and employer engagement,
- The SRC general membership meetings provide an opportunity to listen to and/or address employer or business concerns via the Employer Forum segment of the agenda. This forum also affords OVR the opportunity to promote and market the PreETS and transitioning students.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

During the general membership meeting of the CNMI Council on Developmental Disabilities (CDD) on 11/12/15, of which the OVR and the Medicaid are members, formal discussions on how we can collaborate with Medicaid to provide longer term supported employment and extended services to people with the most significant disabilities through applicable waiver(s) was initiated. The Medicaid Administrator informed council members that because of a Medicaid cap for the CNMI and other territories, certain waivers are not applicable, and until such time that the cap is lifted, Medicaid will be unable to provide home and community-based services in support of competitive integrated employment. In recent local news, U.S. Sen. Mazie Hirono is interested in looking into lifting the Medicaid cap for the territories, including the CNMI, and if this were to be successful it would possibly mean the provision of much needed extended services to individuals with most significant disabilities. This was also noted in the 2017 CSNA. The Medicaid continues to provide services under their State Plan of 1989.

Mandatory services include: inpatient services; outpatient services; other lab and x-ray; nursing facility services (only when referred off-island); physician's services; early and periodic screening, diagnosis, and treatment for children under 18; home health care (only when referred off-island); family planning services; and rural health clinic (only when referred off-island).

In addition, optional services are also covered, such as: clinic services; optometry services; other practitioner services; dental services; physical and occupational therapy (rehabilitation); speech, hearing, and language disorders; prescribed drugs, dentures, prosthetic devices, and eyeglasses; wheelchair; medical supplies; and transportation (to off-island facility only). Continued discussions with Medicaid by the CNMI Disability Network Partners (OVR included) will be planned including obtaining federal-level guidance and technical assistance on how CNMI's current Medicaid restriction on the cap may be overcome to provide additional longer term services needed by people with more significant disabilities in order to achieve competitive integrated employment.

Note: Effective March 2021 The territory provides Medicaid eligibility to otherwise eligible individuals who lawfully reside in the Commonwealth of the Northern Mariana Islands in accordance with the Compacts of Free Association (COFA) between the Government of the United States and the Governments of the Federated States of Micronesia, the Republic of the Marshall Island, and the Republic of Palau. These individuals are not subject to the 5-year waiting period described in 8 USC 1613(a). (8 U.S.c. §1612(b)(2)(G); 8 U.S.C. §1613(b)(3); 8 u.s.c. §1611(b)(8)).

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

CNMI OVR partners with the Council on Developmental Disabilities by engaging in activities that promote and improve our public VR program; identify and address the employment and other needs of people with disabilities; strengthen partnerships among the local Disability Network Partners (OVR, CDD, Northern Marianas Protection & Advocacy Systems, Inc., University Center for Excellence in Developmental Disabilities, CNMI Assistive Technology Program, Transition Coalition, Employers, community rehabilitation programs, etc.); advocate that people with disabilities receive timely and quality services from community providers; educate the public on the mandates of federal and local statutes as they pertain to people with disabilities; leveraging of resources and expertise on similar State Plan goals/objectives for the benefit of VR consumers and potential applicants; among other things.

Collaboration with the CDD takes on the following form:

- Regular communications throughout the year.
- Involvement in mutual councils and boards, such as the Council on Developmental Disabilities, the State Rehabilitation Council, the Special Education State Advisory Panel, the Consumer Advisory Committee of the University Center for Excellence in Developmental Disabilities, the Statewide Independent Living Council, etc.
- Involvement in mutual coalitions, for instance, the Transition Coalition and the Disability Network Partners.
- Attendance and participation at each respective programs' public hearing or forum to help inform the State Plan development.
- Leveraging of resources and expertise in areas of employment, advocacy, and systems change resulting in competitive, integrated, and timely services.
- Information and referral related to employment.

CNMI CDD is committed to promoting systems change, providing advocacy, and supporting the independence, productivity, integration, and inclusion of individuals with developmental and other disabilities in our island community.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

The Community Guidance Center (CGC) is the primary provider of mental health and substance abuse services for all individuals residing in the CNMI. It incorporates all outpatient mental health services and administers all Federal health programs in the CNMI related to mental

health and substance abuse, as well as all other publicly funded mental health services. Through collaboration and establishing interdependent relationships with other system providers, CGC is committed to providing high quality mental health and substance abuse treatment and other therapeutic services to the multi-diverse population of the CNMI, as well support services to families and friends, community outreach, prevention and education services, and referral assistance to other community resources.

OVR initiated discussions with CGC about possibly entering into a memorandum of understanding (MOU) on how to better serve mutual consumers in achieving competitive integrated employment. In Program Year 2022 this will be revisited between OVR and CGC and will be reviewed by OVR's Legal Counsel.

CNMI OVR aims to collaborate with the Community Guidance Center (CGC) as described below:

1. The OVR Director or designee will regularly attend and actively participate in the meetings of the CNMI Behavioral Health Planning Council and bring to its forefront disability employment-related issues as they affect OVR consumers with behavioral health conditions.
2. OVR will conduct an annual informational presentation on its programs and services to CGC staff and stakeholders.
3. OVR will work closely with CGC staff to ensure that OVR consumers are receiving proper behavioral health and/or substance abuse treatment per their approved IPE.
4. Additionally, OVR will establish an MOU with CGC with the overarching goal of improving employment outcomes for consumers with behavioral health conditions to be completed by the second quarter of PY 2022.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

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;

Direct VR services are provided by the following personnel to an estimated 300 individuals/consumers per year: 3 VR Counselors, 3 VR Counselor Aides, and 1 Employment Specialist.

The qualifications of CNMI OVR staff are under consistent annual review to identify educational and training needs that are required to enhance professional development. These needs are incorporated in individual staff development plans that conform to both CNMI Personnel Service System Rules & Regulations (PSSR&R) and VR standards as established in the Rehabilitation Act Amendments of 1998.

All counseling professionals who do not meet these standards will be required to demonstrate significant progress per Section 101(a)(7) of the Rehabilitation Act. Activities that will continue to be conducted on an annual basis include:

- Projections on the number of VR consumers to assess staffing needs, and to maintain or plan appropriate and adequate staffing levels;

- Findings of monitoring reports, SRC recommendations, Consumer Satisfaction Survey results, and performance evaluations will be reviewed for staffing suggestions. Other documents, such as reviewers' comments on the State plan development, deficiencies noted in submitted quarterly/annual RSA reports, and monitoring reports will also be reviewed;
- Consulting with VR staff to identify training topics to support personnel development;
- Partnering with the Disabilities Network Partners (DNP) to identify mutual training needs that would allow for the leveraging of funds;
- Ongoing reviews of progress on the individual professional staff development plan.

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

The Office of Vocational Rehabilitation currently employs fifteen (15) personnel that provide VR services to an estimated three hundred (300) individuals/consumers per year.

VR administrative support and services are provided by:

- One (1) Director
- One (1) Fiscal Officer with over forty (40) years dedicated to CNMI OVR
- One (1) Administration and Operations Specialist
- One (1) Data Analyst
- One (1) Administrative Clerk
- One (1) Office Clerk,

Direct VR/ILOB services are provided by:

- One (1) Case Services Manager
- Three (3) VR Counselors (General),
- One (1) Employment Specialist.
- One (1) VR Transition Specialist,
- One (1) ILOB Case Manager, and
- Two (2) VR Counselor Aides.

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

Due to CNMI OVR's increased outreach activities, the program anticipates about a 5% increase in the number of individuals/consumers that will be served in PY 2022-2023. The OVR has also increased activities in seeking out potential applicants at the public high schools as well as the college and trades school campuses. In addition, VR Counselors make regular visits to the islands of Tinian and Rota thereby receiving a steady number of applications through the year, not to mention those received from Saipan. Current counselor caseload average fluctuates between 56 to 88 (*does not include PreETS*). In addition, WIOA puts special emphasis on employer engagement activities as employers comprise VR's second customer base. CNMI OVR

successfully pursued the recruitment and hiring of its Employment Specialist who officially assumed her position on August 30, 2021 through the ARPA fund under the Office of the Governor. In addition, CNMI OVR recruited and hires its of the Case Service with a Certified Rehabilitation Counselor credential from the Commission on Rehabilitation Counselor Certification in PY 2020. The chart below represents current and projected vacancies by job title:

Job Title	Total Positions	Current Vacancies	Projected Vacancies
Director	1	0	0
Fiscal Officer	1	0	1
Administrative Operations Specialist	1	0	0
Administrative Clerk	1	0	0
Data Analyst	1	0	0
Office Clerk	1	0	0
Special Projects Coordinator	0	0	1

Direct Service Providers:

Job Title	Total Positions	Current Vacancies	Projected Vacancies	Staff to Consumer Ratio
Case Services Manager	1	0	0	150
VR Counselor	3	0	1	50
VR Counselor Aide	3	0	1	75
ILOB Case Manager	1	0	1	75
Employment Specialist	1	0	1	75
VR Transition Specialist	1	0	1	75

VR Counselors are exclusively responsible for the five non-delegable functions (eligibility determination; priority of service; Individualized Plan for Employment approval and signature; Individualized Plan for Employment revisions or amendments; and determination that a successful employment outcome has been achieved and the record of services can be closed). Collectively, the VR Counselor, VR Counselor Aide, Employment Specialist, and Case Services Manager focus on providing VR services necessary for consumers to prepare for, find, and retain employment. The , VR Transition Specialist provides direct services to potentially eligible students for VR Services and the Pre-ETS coordination and authorized services for students with disabilities currently in Special Education High School including post-secondary educational program so long as they satisfy the age requirements set forth in final §361.5(c)(51).

In 5 years, CNMI OVR is anticipating the need for additional staffing resources (e.g., 1 VR Counselor and 1 VR Counselor Aide) to meet the increasing number of individuals/consumers served over time-in particular, anticipating the following projected increase on the consumers we will serve:

1. 300 for PY 2022
2. 315 for PY 2023
3. 331 for PY 2024
4. 358 for PY 2025
5. 366 for PY 2026

B. PERSONNEL DEVELOPMENT

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

The Northern Marianas College (NMC) is the sole entity providing higher education in the CNMI. Undergraduate degree programs being offered that help individuals to prepare for a career in VR include

Bachelor of Science Degree in Education with a Concentration in:

1. Rehabilitation and Human Services
2. Special Education
3. Bachelor of Science Degree in Business Management with a Concentration in Accounting

CNMI OVR has one (1) VR Counselor with a general caseload who completed the San Diego State University's (SDSU) Master's degree program in Rehabilitation Counseling via distance learning in August 21, 2019. The CNMI VR Transition specialist is currently pursuing his four-year degree program in Rehabilitation and Human Services at the Northern Marianas College, with the anticipated completion date of Spring 2023.

CNMI OVR continues to encourage its counseling support staff to enroll at the Northern Marianas College at the level of their professional development needs and requirements.

CNMI OVR will continue to explore educational and training opportunities offered by other educational institutions that can further assist with enhancing the professional development of its staff.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

INSTITUTION: NORTHERN MARIANAS COLLEGE	
VR Related Programs	ENROLLED
Bachelors of Science in Education	
Concentration in Rehabilitation and Humans Services	1
Concentration in Special Education	1
Associate of Science in Nursing	1
Associate in Arts in Liberal Arts	
Emphasis in Social Work	1

INSTITUTION: NORTHERN MARIANAS COLLEGE	
VR Related Programs	ENROLLED
TOTAL	4
OTHER DEGREE PROGRAMS	
Associate in Arts in Liberal Arts	12
Associate in Applied Science in Criminal Justice	4
Associate in Applied Science in Business Management	3
TOTAL	19

Please note that this data is provided by NMC's Disability Support Services (DSS) Program and is based on NMC students who have self-identified and were availing of services from NMC's DSS Program as of Fall 2020.

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.

INSTITUTION: NORTHERN MARIANAS COLLEGE	
VR Related Programs	GRADUATED
Bachelors of Science in Education	
Concentration in Rehabilitation and Humans Services	
Concentration in Special Education	
Associate of Science in Nursing	
Associate in Arts in Liberal Arts	
Emphasis in Social Work	1
TOTAL	1
OTHER DEGREE PROGRAMS	
Associate in Arts in Liberal Arts	
Associate in Applied Science in Criminal Justice	
Associate in Applied Science in Business Management	
TOTAL	0

Please note that this data is provided by NMC's Disability Support Services (DSS) Program and is based on NMC students who have self-identified and were availing of services from NMC's DSS Program as of Fall 2020.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

The CNMI OVR continues to maintain its affiliation with the San Diego State University (SDSU) for its long history of serving the VR educational and training needs of the Marianas Region. In addition, there are no institute of higher education within the CNMI and Micronesia that offers a Master's degree in Rehabilitation Counseling. CNMI OVR's recruitment efforts include contacts at SDSU and with the National Rehabilitation Leadership Institute (NRLI) as well as the Council of State Administrators of Vocational Rehabilitation (CSAVR), to name a few, for referrals or information about recent graduates in the field.

Similar to SDSU, CNMI OVR as well maintains its affiliation with the Northern Marianas College (NMC) as it offers a Bachelor's degree program in Rehabilitation and Human Services (RHS). CNMI OVR will continue its efforts in obtaining a list of CNMI students who are locally pursuing RHS as well as those who are receiving local scholarship assistance and majoring in related fields at off-island universities and/or colleges. These students will be sent information about careers in rehabilitation counseling in hopes of igniting interest via brochures and information packets provided to the CNMI Scholarship Office.

Furthermore, CNMI OVR will be open to exploring a potential partnership with the University of Hawaii as they, too, offer a Master's degree program in Kinesiology and Rehabilitation Science with a concentration in Rehabilitation Counseling.

Job skills development for current personnel will be accomplished through enrollment in appropriate classes at the Northern Marianas College. Staff's educational, skills, and professional development will also be reinforced by regularly scheduling staff to attend job skills training sessions conducted by other government or partner agencies, as well as in-service trainings provided by staff.

Other recruitment and retention activities include:

- Participating in job fairs and career day activities to generate interest and awareness among college and high school students including students with disabilities of potential career opportunities in the field of vocational rehabilitation;
- Encouraging students who are ready to graduate from high school and post-secondary institutions to file resumes that may be considered if and when a VR vacancy is created through retirement, resignation, promotion, or transfer of existing staff and when additional counseling positions are established in the future;
- CNMI OVR leadership will continue to identify trainings for managers to ensure they are able to assist employees in effectively dealing with stress;
- Providing supports to staff in the form of problem-solving sessions along with coaching, leadership, and mentoring services. A structured mentoring program aimed at pairing a more experienced staff with a less experienced employee will help to promote and encourage the development of specific job skills, provide ongoing feedback, and create an individual growth or career plan for staff;
- CNMI OVR will remain committed to providing its staff, especially those providing direct services, with opportunities to meet agency standards as well as career advancement.

CNMI OVR utilizes and practices the same recruitment strategy and procedure administered under the local Office of Personnel Management (OPM). Currently, CNMI OVR does not use nor

does it have a different recruitment procedure or system to reach minorities and individuals with disabilities.

The CNMI government is in itself a minority as one of the five (5) insular areas; therefore, CNMI residents, for the most part, are considered minorities. It is important to point out that since the inception of the CNMI government in 1978, the OVR was also instituted as an agency and all its employees were and continue to be representative of minority groups. Currently, at least nine (9) of CNMI OVR's fifteen (15) staff members are individuals with disabilities. CNMI OVR promotes the employment of qualified individuals with disabilities without regard to race, disability, etc.

3. PERSONNEL STANDARDS

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

To ensure that CNMI OVR counselors are comparable to U.S. mainland rehabilitation counselors, CNMI OVR maintains adherence to the WIOA requirements for qualified rehabilitation counselors, which is a Bachelor's degree in Special Education, Humanities, Vocational Rehabilitation Counseling or related field from an accredited U.S. College or University.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

All non delegable functions (determination of eligibility, IPE development, IPE amendment, annual review of the IPE, and closures) are performed by staff who are qualified VR professionals who meet WIOA standards.

4. STAFF DEVELOPMENT

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

CNMI OVR's ongoing staff development activities which incorporate both on- and off-island opportunities include:

- Enrolling in relevant courses offered at the Northern Marianas College and any other organizations or institutions that offer coursework that will enhance job skills;
- Attending related trainings, workshops, and seminars offered by other government agencies and organizations as well as in-service trainings provided by CNMI OVR staff or its community partners;
- Attending conferences and workshops that cover specific VR-related issues to enhance program knowledge and practices and to earn VR counselor professional certifications and Continuing Education Units;
- Coordinating intensive training sessions with VRTAC-QE and VRTAC-QM or other designed specifically for VR staff covering a variety of subjects that will enhance work skills, professional development, and program knowledge;

- Initiating inter-agency awareness through trainings and workshops covering VR issues with appropriate staff from partner agencies and other organizations; and
- Continued networking with San Diego State University-National Rehabilitation Leadership Institute (SDSU-NRLI) graduates and the Council of State Administrators of Vocational Rehabilitation (CSAVR) for assistance in VR counseling, management, and staff training needs.
- OVR continues to identify and engage in web-based trainings as appropriate at minimal to no cost to the program. CNMI OVR plans to maintain its relationship with VRTAC-QE and VRTAC-QM to provide needed trainings in topic areas determined important to enhance job skills as well as to improve the general performance of our VR program.

The educational needs for CNMI OVR personnel are determined based on:

- Input from the State Rehabilitation Council,
- Findings of the RSA Monitoring Report,
- Comprehensive Training Needs Assessment,
- Individual Staff Performance Evaluations, and
- Staff input into their individual training needs.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

CNMI OVR continues to identify and engage in web-based trainings as appropriate at minimal to no cost to the program. All staff development activities are supported by our Title I-Basic Support grant. CNMI OVR plans to maintain its relationship with SDSU-II and VRTAC-QE, and VRTAC-QM to provide needed trainings in topic areas determined important to enhance job skills as well as to improve the general performance of our VR program.

Continuous sharing of information, especially those obtained at trainings, conferences, seminars, webinars, etc. are highly encouraged among staff members. Monthly staff meetings offer a welcome venue to share, review, and discuss various VR materials or literature. Quarterly meetings of the councils (SRC & SILC) also offer a forum for information sharing. In addition, CNMI OVR's website offers a wealth of information to benefit a wide audience including VR staff themselves.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

The majority of CNMI OVR staff members are multi-lingual, with personnel who can speak, read, and/or write in English, Chamorro, Carolinian, Chuukese, Palauan and Filipino. Certified ASL interpreters are utilized for consumers who are deaf or hard of hearing. CNMI OVR will support staff interest related to new language acquisition including ASL as part of its comprehensive system of personnel development (CSPD) to address ongoing communication needs. Certified ASL interpreters are utilized for consumers who are deaf or hard of hearing.

Additionally, OVR will procure translation services through a fee for service arrangement on an as-needed basis. Recommendations for translation services from the Disability Network Partners will be sought and taken into consideration.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

In FY 2019, CNMI OVR and the Public School System-Special Education Program (PSS-SPED) completed two (2) personnel development activities through joint training sessions that involve CNMI OVR employees and PSS-SpEd faculty/staff. WINTAC and NTACT provided the training and technical assistance (which also included specific partners), on the WIOA requirements and implementation on topics that included pre-employment transition services (Pre-ETS) and coordination with education officials for improved services to students with disabilities as they transition from high school to postsecondary activities including competitive & integrated employment, continued education, and/or independent living. Follow up trainings and activities will be planned to ensure continuous improvements.

In the near future, CNMI OVR will collaborate with the CNMI Public School system to plan for an updated personnel development joint training session with CNMI OVR employees and PSS-SPED faculty/staff to ensure continuous improvement.

In addition, OVR will initiate a technical assistance (TA) request from the National Technical Assistance Center on Transition: The Collaborative (NTACT:C) for the delivery of quality personnel development to OVR and the Public School System's Special Education Program (PSS-SPED). It is anticipated that the trainings will occur during PYs 2022 and 2024.

The purpose of the personnel development (PD) is to help CNMI build capacity in terms of School-to-Work Transition, including Pre-Employment Transition Services (Pre-ETS). Primary objectives will focus on data to drive decision-making and the strengthening of interagency collaboration to improve outcomes for students and youth with disabilities (e.g., increased graduation rates and enrollment in post-secondary options that lead to credential attainment and competitive integrated employment).

Furthermore, TA may also include a review of the existing MOU's terms and conditions for any necessary updates.

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;

In 2020, CNMI OVR contracted the professional services of Max Impacts: Maxine Laszlo Consulting to conduct a comprehensive statewide needs assessment (CSNA) of the VR needs of people with disabilities residing in the Commonwealth. In part, the purpose of the needs assessment, which was completed on March 31, 2021, was used to help inform the modification of OVR's State Plan for PYs 2022 and 2023.

Itemized below are the needs of individuals with most significant disabilities, including their need for supported employment services, and the recommendations offered to OVR based on the results of the most recently-conducted CSNA:

- Offer benefits planning counseling to help dispel fears about losing SSA benefits when an individual is thinking to perhaps pursue meaningful employment (Note: This was also identified in the 2017 CSNA.).
- Continue to explore opportunities to identify qualified individuals or established vendors to provide personal assistance and interpreter services. (Note: In recent local news, U.S. Sen. Mazie Hirono, is interested in looking into lifting the Medicaid cap for the territories, including the CNMI, and if this were to be successful it would possibly mean the provision of much needed extended services to individuals with the most significant disabilities. This was also noted in the 2017 CSNA.)

- Strengthen partnership with the Community Guidance Center to address the low rehabilitation rates of participants with mental health conditions.
- Address delays in the provision of complex rehabilitation services (e.g., AT) that are not locally available. This may involve participation of external local government agencies in the development of a streamlined process resulting in timely acquisition of IPE-approved services.
- Maximize OVR's internal resources (e.g., Employment Specialist) to provide job coaching services as needed. In addition, OVR will continue discussions and/or negotiations with prospective individuals or established vendors qualified to provide job coaching services in the hopes of entering into some kind of service agreement.
- Vocational rehabilitation counselors will continue to be regularly trained on supported employment consistent with WIOA regulations and requirements. (Note: This was also indicated in the 2017 CSNA.)

B. WHO ARE MINORITIES;

The CSNA report also captured information regarding recommendations to assist minorities as well as individuals that are unserved or underserved to better have access to and participate in VR:

- Partner with the Northern Marianas College to train individuals to become certified personal care attendants to support the needs of program participants with the most significant disabilities. OVR may consider entering into a business agreement with individuals who successfully complete the training program in an effort to help expand community rehabilitation programs for greater access to rehabilitation services.
- Due to limited job opportunities in Tinian and Rota, utilize the self-employment program as a mechanism for OVR participants to achieve financial independence and sustainability.
- For participants with transportation needs, agree to meet with them at their residence in an effort to continue their involvement in the rehabilitation process.
- Partner with the Veterans Affairs Office and the Office of U.S. Congressman Gregorio Kilili Sablan to leverage resources to better meet the needs of our Veterans with service-related disabilities.
- Advocate for tax incentives for community rehabilitation programs to open up satellite offices in Tinian and Rota so as to expand the availability of rehabilitation services in underserved communities.
- Distribute program materials in various languages to support non-English speaking participants as well as offer professional development opportunities to staff related to the acquisition of new language including ASL.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Please see response to j.1.B. above.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

The following information was extracted from the 2020 CSNA report:

- The WIOA core programs should identify a case management tracking system that will work for all programs to be able to co-manage mutual cases. (Note: This was also noted in the 2017 CSNA.)
- WIOA core programs will undergo regular cross-training on the process and procedures of co-supporting participants with disabilities. (Note: This was also noted in the 2017 CSNA.)
- Collaborate with the WIOA core programs to educate the public on each respective program's eligibility guidelines and requirements.
- Maintain regular communications with the State Workforce Development Board to move OVR's disability employment agenda forward for the benefit of individuals with disabilities.
- Leverage the networks of the other WIOA core program (e.g., WIA and ABE) to further expand opportunities that lead to long-term competitive integrated employment.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

The following information describes the needs of transition-aged youth with disabilities in the CNMI and is taken from the new comprehensive statewide needs assessment report:

- "The pre-employment transition services program needs to be marketed to students and parents so that they are familiar with the possible activities and the purpose of the program.
- OVR should develop a way to track graduating students and those that receive pre-employment transition services in order to help reduce the number that lose contact after graduation.
- OVR needs to ensure that they are taking advantage of the summer youth program through the Title I youth program. Youth with disabilities should be engaging in these opportunities along with all other youth in CNMI.
- OVR has been working with the WINTAC in the area of implementing pre-employment transition services. It would be helpful for OVR to ensure that they work with WINTAC to develop internal control policies and procedures on pre-employment transition services expenditures and service delivery.
- The need to establish high expectations for youth continues to be a recommendation. Youth with disabilities need to be encouraged to reach high and not to settle for a life of dependence on public support. Family education and peer mentoring can help set high expectations.
- OVR should encourage the pursuit of postsecondary education by assisting individuals to obtain part-time employment while they go to school and utilizing OVR resources for this purpose. This will help address the financial need of individuals and will help OVR achieve their common performance measures associated with credential attainment and skills gains.
- The Department of Education should ensure that IEPs are developed using person-centered planning. It would be helpful to ensure that all Special Education teachers have regular training on person-centered planning.

- The OVR counselor needs to be invited to every IEP as long as the student is agreeable to this.
- OVR should utilize social media to communicate with young consumers and help keep them engaged in the VR process” (pp.50-51).

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Information below was also taken from the CSNA report covering fiscal years 2017-2019:

- In collaboration with the Disability Network Partners, advocate for tax incentives for established vendors to make their programs and services available to individuals with disabilities residing in Tinian and Rota.
- Discuss and/or negotiate with local government agencies (e.g., Finance) the possibility of streamlining and/or expediting procurement processes for products and/or services ordered through OVR-affiliated community rehabilitation programs.
- Collaborate and coordinate efforts with the Veterans Affairs Office and the Office of U.S. Congressman Gregorio Kilili Sablan to address mental health related needs of our Veterans participating in the VR program.

OVR continues its work into identifying qualified individuals or established service providers to be a part of its CRP network serving eligible participants with disabilities including those with most significant disabilities.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

There is general consensus among community partners/stakeholders that students with disabilities will better prepare for the 21st century workforce through the provision of transition career services and pre-employment transition services. Curriculum on work readiness provided either in a classroom setting or community-based by private community rehabilitation programs/vendors should focus on helping the students to enhance their skills including soft skills and communication skills thereby boosting self-confidence for increased positive outcomes throughout the employment process. Our VR Staff is and should be in regular contact with the school personnel through co-location presence as well as attendance at invited IEP meetings. To also better improve experiences and outcomes, employers must be supported with information and instructions as well as educated on innovative strategies with regards to how best to communicate or interact with students with varying disabilities and meet their unique needs by means of engaging them in disability etiquette trainings and professional developments, as well as extended-inclusion in events that celebrate disability employment awareness so as to promote and highlight the business partnership between OVR and the employer.

The most recent CSNA report noted that each of the pre-employment transition services (e.g. Job exploration counseling; Work-based learning experiences; Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education; Workplace readiness training to develop social skills and independent living (often referred to as soft skills); and Instructions in self-advocacy, which may include peer mentoring) “is a need on a recurring basis when discussing the needs of transition-age youth in CNMI” (p. 45). In addition, the “following themes emerged across all data gathering methods regarding the needs of youth with disabilities in transition in CNMI:

- A lack of work skills, soft skills, work experience and knowledge regarding the expectations of the workforce are all barriers to employment for youth with disabilities in CNMI.
- OVR should engage youth with disabilities in the schools as early as in middle school and maintain contact with them upon promotion, and eventually, high school graduation.
- Disability still has a stigma attached to it for many families in CNMI, so the need for education about disability remains high” (p. 43).

OVR will continue to maximize all efforts to increase successful transition outcomes in collaboration and coordination with community stakeholders including our education partners through transition including pre-employment transition services.

K. ANNUAL ESTIMATES

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

The number of individuals in the State who are currently eligible for services by program (PY 2020) category are as follows:

- Title I, Basic Support = 201 individuals (ST 10)
- Title VI, Part B, Supported Employment = 3 individuals

While the number of persons potentially eligible for OVR services is variable, our best estimate from data obtained through PSS-SpEd Program is 263 high school students with disabilities between the ages of 16-24 and 64 will compose the BS and SE caseloads for FY 2021.

(Estimated calculations based on a three (3) year average as reported in the OVR Consumer Tracking System (CTS) and the RSA 911 data).

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

Estimate calculated based on a three (3) year average as reported in the Program's Financial Status Report.

Title I, Basic Support: FFY 2021 to FFY 2022 is 208 individuals with approved IPE's with a re-evaluation to be completed for possible increases for FFY 2023-2024.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

Estimate calculated based on a three (3) year average as reported in the OVR CTS and RSA 911 data:

Title VI, Part B, Supported Employment: Estimated 9 individuals for FFY 2020 TO FFY 2021, with a review and re-evaluation to be completed for FFY 2022- 2023.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

Currently and historically, the CNMI Office of Vocational Rehabilitation has been able to avoid implementing an order of selection, although policies and procedures are in place to ensure that should the need arise, the Program will be prepared. The OVR will continue to manage its fiscal resources to ensure that all active Individualized Plans for Employment (IPE) are achieved.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

Not Applicable.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

Title I, Basic Support: 208 individuals

Cost per individual = \$802

Total cost = \$166,716

Title VI, Part B:

Supported Employment: 11 individuals

Cost per individual = \$773.37

Total cost = \$8,507

The data from the OVR CTS was used in conjunction with the RSA-2 data from the Rehabilitation Services Administration (RSA), as well the OVR Financial Status Report. The data was separated and is reported according to the content areas requested.

General Performance Data for OVR 2017-2019 as per most recent CSNA

Item ALL CONSUMERS

ALL CONSUMERS

ITEM	2017	2018	2019
Ave. # days of open case for cases closed other than rehabilitated	1023	1298	1247
Cases closed other than rehabilitated	35	23	50
Ave. # days of open cases closed rehabilitated	714	851	796
# of cases closed rehabilitated	31	25	24
Rehabilitation rate	46.97%	52.08%	32.43%
Median earnings of those closed as successfully rehabilitated	\$14,976	\$15,100	\$21,268

Total # cases served	267	262	264
Ave. cost of all cases	\$714.24	\$508.31	\$540.46
Ave. cost of cases closed rehabilitated	\$1,421.97	\$1,129.89	\$2,049.21
Ave. cost per case	\$405.69	\$428.07	\$20.51

Total # cases served	267	262	264
closed unsuccessful			
Ave. cost per case prior to plan	\$21.13	\$0	\$0

L. STATE GOALS AND PRIORITIES

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

The CNMI Office of Vocational Rehabilitation (OVR) and the State Rehabilitation Council (SRC) reviewed and jointly developed and modified their State Plan goals and priorities for Program Years 2022-2023 including any modifications and incorporated the findings and recommendations of the most recently conducted Comprehensive Statewide Needs Assessment (CSNA) in 2020. Four (4) priority areas were identified

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

Priority 1: Transition and Pre-Employment Transition Services

Goal: Full implementation of pre-employment transition services through the realignment of staff and service delivery methods.

Goal: Expand and improve the CNMI's service delivery infrastructure and the Program's capacity for making available PreETS to students with disabilities in need of such services by utilizing pre-employment transition services Authorized and Coordination Activities.

Priority 2: Business/Employer Engagement

Goal: Increase partnerships with local businesses to develop or expand work experiences through on-the-job and work experience training, internship/ apprenticeship, and employment opportunities for qualified adults and youth with disabilities.

Goal: Develop systems capacity, knowledge and skills to effectively meet the needs of businesses/employers.

Priority 3: Competitive Integrated Employment

Goal: Increase competitive integrated employment opportunities, supports and outcomes for adults and youth with disabilities, particularly those with the most significant disabilities.

Priority 4: Agency Performance

Goal: Improve overall Agency performance

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

As previously mentioned, the goals and priorities of the modified VR Portion of the Unified State Plan for Program Years 2022-2023 incorporated the findings and recommendations of the FY 2020 Comprehensive Statewide Needs Assessment (CSNA).

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

OVR and SRC ensure that the VR Portion of the Unified State Plan goals and priorities were modified collaboratively and in consideration of the most recent CSNA findings and recommendations as well as the requirements of the WIOA common performance measures. Other available information on the operations and effectiveness of the Agency, such as fiscal, audits, RSA monitoring, including any other reports received from the SRC will be utilized.

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.

In 2019 OVR received a Monitoring Report from the Rehabilitation State Administration. The outcome of this monitoring report resulted in three general findings.

- Finding 1.1 OVR did not have written policies in place to ensure accurate data collection and reporting.

Mandated Corrective Action: In accordance with 34 C.F.R. § 361.12, OVR must implement policies and procedures that ensure the proper and efficient administration of the VR program, including those necessary to carry out all functions for which the VR agency is responsible. OVR must develop and implement policies and procedures for collecting accurate data and for verifying the accuracy and reliability of the data through the required supporting documentation. In addition, OVR must monitor and evaluate performance through the agency's internal controls, in accordance with 2 C.F.R. § 200.303. Based on OVR's practices for conducting service record reviews and their existing procedures, RSA determined that OVR was not in compliance with the requirements in 34 C.F.R. § 361.12 or 2 C.F.R. § 200.303.

RSA Focus Area [Performance]

- Finding 2.1 OVR did not ensure that, in collaboration with the LEAs involved, it would provide, or arrange for the provision of, all five required activities for all students with disabilities in accordance with Section 113(b) of the Rehabilitation Act and 34 C.F.R. § 361.48(a)(2).

Mandated Corrective Action: In accordance with Section 113 of the Rehabilitation Act and 34 C.F.R. § 361.48(a) requires each State to ensure that the designated State unit, in collaboration with the LEAs involved, provides, or arrange for the provision of, pre-employment transition services for all students with disabilities. Further, 34 C.F.R. § 361.48(a)(2) requires the State VR agency to provide required activities to include job exploration counseling; work-based learning; counselling on opportunities for enrollment in comprehensive transition or post-secondary educational programs; workplace readiness training; and instruction in self-advocacy.

RSA Focus Area [Pre-Employment Transition Services for Students with Disabilities]

- Finding 3.1 OVR did not maintain effective internal controls over the Federal award that provide reasonable assurance that it is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award, as required by 34 C.F.R. § 361.12 and 2 C.F.R. § 200.303.

Mandated Corrective Action: OVR must develop and maintain effective internal controls over the Federal award that provide reasonable assurances that the non-Federal entity is managing its award in compliance with Federal statutes, regulations, and the terms and conditions of the award, as required by 34 C.F.R. § 361.12 and 2 C.F.R. § 200.303. Specific internal control areas of

deficiency included documentation of control activities to ensure prior approval was obtained, when required, and the submission of accurate and timely financial reports.

RSA Focus Area [Financial Management]

During this global pandemic era, OVR continues to work with RSA to resolve and develop solutions to the findings. OVR will safely administer its programs as outlined in its internal protocols and overtime make the necessary adjustments as appropriate in accordance with CNMI COVID-19 Task Force guidelines and RSA guidance.

M. ORDER OF SELECTION

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

CNMI OVR has not entered into nor is it requesting for an Order of Selection at this time.

B. THE JUSTIFICATION FOR THE ORDER

Not Applicable

C. THE SERVICE AND OUTCOME GOALS

Not Applicable,

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

Not Applicable.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

Not Applicable.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

Not Applicable.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

The CNMI OVR will distribute Title VI Funds for Supported Employment (SE) Services at the WIOA-mandated requirement of 2.5% for administrative costs (e.g. indirect cost) and the balance for the provision and delivery of services to individuals with the most significant disabilities. Fifty percent (50%) of Title VI funds for SE services will be reserved for youth with the most significant disabilities who are between 14 and 24 years old. Services leading towards competitive integrated employment will include, but are not limited to, the following: job training (work experience and OJT); job coaching, accommodations that may be required by VR clients at employment sites; transportation; and/or developing natural supports and assistive technology if needed.

OVR is in coordination with the CNMI Public School System Special Education Program to identify outreach strategies targeting unserved and underserved youth and students with the most significant disabilities. Strategies also include individuals in the outlying islands who might be eligible for Supported Employment services. Plans are in place for the continuation of trainings between OVR and PSS-SpEd Program in collaboration with NTACT, VRTAC-QE, and VRTAC-QM. A variety of trainings are being organized that are designed to increase awareness of supported employment as a vocational service for individuals with the most significant disabilities. PSS SpEd Program documents specified services provided to students and data is shared with OVR.

The OVR anticipates achieving its supported employment goals and priorities through strategies noted in Section O: State Goals.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

CNMI OVR will maximize the use of 50% of Title VI funds to support youth consumers with the most significant disabilities in their achievement of competitive integrated employment through the provision of extended services not to exceed four (4) years, such as: job coaches, personal assistance services, transportation, and other employment-related services determined necessary for consumers to further maintain their competitive integrated employment. OVR will continue to review its policies and procedures to ensure compliance with federal rules and regulations.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

CNMI OVR, in collaboration and coordination with the Council on Developmental Disabilities (CDD) and other Disability Network Partners (DNP), will revisit discussions with the Medicaid program on the previous idea to see if they are willing to submit a Home and Community-Based Waiver to use for extended services to support consumers with most significant disabilities including our youth. OVR is also working with the CNMI Workforce Investment Agency (WIA) to explore expansion of its internship/apprenticeship programs to afford students and adults with the most significant disabilities work experience opportunities.

O. STATE'S STRATEGIES

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

OVR has developed strategies to support the achievement of its Priorities and Goals identified in Section (I) – State Goals and Priorities for Program Year 2020-2023. These program strategies represent OVR's approach to increasing PreETS, refining the development of its business engagement, increasing competitive integrated employment, and improving procedures and processes to achieve the priorities and goals, consistent with the most recent comprehensive statewide assessment, SRC recommendations and relevant reports.

Priority 1: Transition and Pre-Employment Transition Services

Goal 1: Full implementation of pre-employment transition services through the realignment of staff and service delivery methods.

Strategies:

- OVR and PSS-SpEd will implement a potentially eligible tracking system.
- Ensure that there is consistently a hired qualified and experienced Pre-ETS Program Coordinator or Transition Specialist that oversees the provision of direct and authorized services:
 - Job exploration counseling
 - Work-based learning experiences
 - Counseling on comprehensive training and post-secondary education opportunities
 - Workplace readiness training and independent living skills
 - Instruction on self-advocacy

Provide pre-employment transition services training to the new PreETS staff.

- As needed, collaborate with NTACT to ensure adequate training and supports are provided to VR staff.
- Expand business partnerships to establish relationships that will open pathways to opportunities for work-based learning activities.
- Attend IEP meetings of students with disabilities beginning at age 14 to introduce early on the VR program and to establish better coordination with the public schools in the provision of transition services and pre-employment transition services.
- Conduct at least one (1) co-location activity per high school per month while school is in session, as well as at the Northern Marianas College and Northern Marianas Trades Institute to increase student participation and engagement with VR. (Note: Co-locations make it possible for students to participate in the OVR intake and application process. These are also opportunities for OVR to improve networking and strengthen partnerships with school personnel to ensure successful transition outcomes. As well, co-locations provide a forum for Q&A by school staff, parents/guardians, and students with OVR staff.)
- OVR will support the activities of the PSS-SpEd, Co-Op Education & Training Program, etc. that prepare students with disabilities for employment, such as: job shadowing, mentoring, career exploration activities, work-based learning experiences, work readiness training, etc.
- Maintain a “Students Page” on OVR’s website, including specific information about pre-employment transition services.
- Identify methods to address cultural barriers that prevent students with the most significant disabilities from seeking PreETS and OVR services.
- Continue to develop and improve informational material about PreETS to share with teachers, students, and families and to advertise on social media platforms.

Goal 2: Expand and improve the CNMI’s service delivery infrastructure and the Program’s capacity for making available Pre-ETS to students with disabilities in need of such services by utilizing pre-employment transition services Authorized and Coordination Activities.

Strategies:

- Meet regularly with various partners including public and/or non-profit groups or organizations to discuss implementation and cost-sharing of pre-employment transition services to students with disabilities to better equip them for the workforce.
- Review existing MOUs with partners annually to ensure collaboration and coordination, addressing gaps in services, etc. to ensure maximum vocational outcomes.
- At least annual, ensure that information is presented at regular DNP and Transition Coalition meetings on Pre-ETS and the OVR transition process.
- Develop a communications process to ensure the dissemination of Pre-ETS information to students with disabilities and their families to increase awareness of OVR's mission and services offered.
- OVR will collaborate with PSS-SpEd and/or other stakeholders to develop and conduct at least annually, pre-employment transition services Authorized Activities to identify needs and gaps in Transition and Pre-ETS.
- Collaborate with the DNP to explore transportation options, assistive technology and accommodations and supports to assist potentially eligible students.

(Note: Members of the Disability Network Partners include: Council on Developmental Disabilities, Transition Coalition, Public School System, Title I Youth Program, VOICES of the CNMI-Saipan, Tinian & Rota Chapters (a non-profit organization run by and for self-advocates with I/DD), Northern Marianas College (UCEDD, DSS, etc.), Center for Living Independently, Statewide Independent Living Council, State Rehabilitation Council, Protection & Advocacy, Commonwealth Office of Transit Authority, etc.)

Priority 2: Business/Employer Engagement

Goal 3: Increase partnerships with local businesses to develop or expand work experiences through on-the-job and work experience training, internship/ apprenticeship, and employment opportunities for qualified adults and youth with disabilities.

Strategies:

- Fill the vacant position of the Employment Specialist. (Note: Said position was filled on August 30, 2021. The incumbent is the primary point of contact for business engagement activities.)
- Engage employers in identifying, WET, OJT and/or job placement opportunities for VR consumers.
- Participate in job/career fairs sponsored by both public agencies and private sector businesses.
- Develop and/or strengthen relationships with the local business community through participation in employer-sponsored activities or events such as Chamber, SHRM, HANMI, and Rotary meetings.
- Support the personnel development of VR professionals and paraprofessionals especially in the areas of marketing the VR program, engaging employers, supported employment, customized employment, pre-employment transition services, work incentives counseling and benefits planning, etc.
- Disseminate information to public and private sector employers to increase their awareness of how VR services could benefit people with disabilities as well as employers.

- Utilize as a forum the State workforce development board meetings to bring to the forefront disability employment issues facing the Commonwealth and the integration of quality services to people with disabilities in the workforce system.
- Maintain and improve materials provided to employers on OVR's website.
- Coordinate with the Workforce Investment Agency and Adult Basic Education when conducting outreach to local business partners.
- Coordinate with the PSS-Cooperative Education Program when conducting outreach to local businesses.
- Identify and approach businesses that have public/federal contracts with requirements for the hiring of individuals with disabilities.
- Serve as the lead resource to the SWDB, America's Job Center, and core partners to support the hiring, retention and promotion of adults and youth with disabilities.
- In collaboration with the DNP, provide Disability Awareness or other trainings to private and public sector employers.
- In collaboration with the DNP, continue providing outreach, education, and technical assistance to government employers with the purpose of increasing the number of people with disabilities hired.
- Utilize the SRC general membership meetings as a forum to engage employers.
- Sharing of success stories of individuals with disabilities who are meaningfully employed in the CNMI and the employers who support their professional growth and development.
- Address employers' concerns regarding the long processing of WET personnel actions by working with relevant government agencies on a solution to help streamline the process for timely service delivery (e.g., MOU).
- Sponsor an annual event or ceremony recognizing various CNMI employers who through their partnership with OVR actively promote the training, hiring, and retention of qualified participants with disabilities.

Goal 4: Develop systems capacity, knowledge and skills to effectively meet the needs of businesses/employers.

Strategies:

- Develop or adopt training curriculum on career pathways and the utilization of labor market information.
- Assignment of the Employment Specialist to manage Business Services (ongoing).
- Development and adoption of strategies to improve business engagement.
- Continue to work with the Vocational Rehabilitation Technical Assistance Center – Quality Employment (VRTAC-QE) for technical assistance in improving and enhancing the program's Business Services.
- In collaboration and coordination with various community partners, meet the training needs of employers in the public and private sectors in the areas of reasonable accommodations, the benefits of hiring qualified people with disabilities, tax incentives for hiring individuals with disabilities and making workplaces accessible, etc.

- Identify businesses that have federal contracts with requirements for hiring individuals with disabilities.
- Explore and develop an online service through its website that would allow businesses to request for trainings and supports.
- Continue outreach, education and trainings/technical assistance to state government agencies for the purpose of increasing the number of people with disabilities hired.
- Continue to monitor the effectiveness of the marketing materials targeting businesses to ensure needed modifications or revisions are completed.
- Engage employers in Etiquette Training (e.g., disability awareness and sensitivity) in support of the WET and OJT programs. This will also extend to businesses offering participants with full- or part-time employment.

Priority 3: Competitive Integrated Employment

Goal 5: Increase competitive integrated employment opportunities, supports and outcomes for adults and youth with disabilities, particularly those with the most significant disabilities.

Strategies:

- Conduct regular case staffing with VR counselors either individually or in a group setting.
- Expand self-employment opportunities for VR clients, especially in Tinian and Rota where the economy can remain stagnant for an indefinite period of time.
- Work with Disability Network Partners including the State Rehabilitation Council to identify potential vendors capable of providing supported employment and/or extended services to VR clients, especially those with the most significant disabilities.
- Support activities that will increase self-advocacy skills of people with disabilities.
- Consider training current or former VR clients to provide much needed supported employment and/or extended services to individuals with disabilities especially those with the most significant disabilities in Saipan as well as the unserved or underserved municipalities of Tinian and Rota. Because the number of CRPs is very low in the CNMI, OVR will continue to try and develop individual service providers to provide service needs like job placement and job coaching.
- Maximize training and/or postsecondary educational opportunities for VR clients to better prepare them for the 21st century workforce and develop support systems for consumers to attend this training.
- Ensure that clients are progressing through the VR process in a timely manner.
- Ensure consumers' full participation in the IPE process (informed choice).
- OVR will ensure timely communication with clients throughout the VR process.
- Continue the provision of supported employment services to consumers with most significant disabilities.
- Identify new providers that can offer work readiness training.
- The OVR will continue coordinating and collaborating with the DNP to identify, prepare and support all individuals with intellectual and developmental disabilities that choose competitive integrated employment.

- Conduct and participate in meetings and forums to disseminate information on achieving competitive integrated employment for individuals with intellectual and developmental disabilities.
- Meet with WIOA core partners to ensure continuous reviews are conducted on the systems and processes of data sharing and the AJC.
- Enhance career counseling and information and referral resources, guidance, and materials for VR staff and stakeholders to optimize service delivery in support of Section 511 of the WIOA and the Competitive Integrated Employment Blueprint.
- Engage in discussions/negotiations with the State workforce development board regarding the development and maintenance of an American Job Center (aka One-Stop Center) where services to people with disabilities are streamlined and accessible.
- Through OVR's newly-launched Job Club Pilot Project, in-house services are being provided to participants to help them learn and/or develop soft skills as well as job-seeking skills. Services are facilitated by the Employment Specialist and supported by VR Counselors, who take on the role of a coach or mentor. Topics are individualized to meet the unique needs of the clients.
- Offer benefits planning and counseling to participants to ease their concerns about losing SSA benefits so that they may confidently choose to pursue VR activities leading to competitive integrated employment.
- Improve supports to participants by ensuring that there are no significant delays in the provision of rehabilitation services such as assistive technologies procured via off-island vendors. This process will involve discussions and/or negotiations by both OVR and the Department of Finance, for example, to help streamline the process timely and efficient service delivery.
- Maximize the self-employment program for participants residing in localities where the job market is stagnant.
- Supporting efforts to provide tax incentives to businesses who expand their services or establish satellite offices in the islands of Tinian and Rota. This effort to help expand community rehabilitation programs in remote locations will contribute to more participants with disabilities achieving competitive integrated employment.
- Due to our economy having greatly suffered as a result of the global pandemic and other natural disasters resulting in very minimal local financial support, OVR should actively pursue other funding sources to support the provision of quality services to clients.
- Actively provide participants with work preparation training and services through the Job Club initiated as an in-house service.
- Collaborate with higher education partners to develop a curriculum and provide training on personal assistance care. Individuals who successfully complete the training program may have the opportunity to enter into a business relationship with OVR to provide personal assistance services to participants with most significant disabilities.

Priority 4: Agency Performance

Goal 6: Improvement of overall Agency performance

Strategies:

- Review and revisions, as needed, to policy, procedure, practice, and the preparation of personnel to achieve the goals of pre-employment transition services.

- Continue monthly outreach activities in Tinian and Rota, and continue with positive working relationships with the Mayors' Offices to ensure effective services to people with disabilities.
- Work with technical assistance providers to develop and/or strengthen Agency's policies and procedures including internal controls.
- Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).
- Identify and utilize comparable benefits to the maximum extent possible.
- Enhance the OVR website so as to create a one-stop for disability employment information beneficial to all stakeholders including consumers/family members (as well as students with disabilities), service providers, and employers.
- Coordinate with partners on outreach activities to better maximize resources and expertise as well as strengthening relationships with each other.
- Utilize the OVR Tracking System to monitor case status movements on a weekly or bi-monthly basis and identify modifications for enhancement, if any, as well as explore a new web-based system with remote accessibility with the CNMI WIOA Core Program Partners or other.
- OVR will continue to address internal control matters in the next two (2) program years.
- The agency will continue its fiscal forecasting reviews in PYs 2022 and 2023.
- Conduct focus groups to solicit feedback about what the partners think is needed to enhance services for people with disabilities.
- Continue to review referral processes and forms pertaining to the American Job Center (or One-Stop).
- Upon completion of the America's Job Center, the OVR will provide training to AJC staff on topics such as: OVR services; eligibility; job placement; case management; benefits counseling; job readiness and soft skills; disability awareness and etiquette; hiring persons with disabilities; disability disclosures; competitive integrated employment; customized employment; assistive technology; and, reasonable accommodation.
- Provide referral resource information to the WIOA core programs serving individuals with disabilities, such as accommodations for individuals who are blind and visually impaired or deaf and hard of hearing.
- Continue outreach efforts on a statewide basis to increase awareness and understanding about OVR's programs and services including eligibility criteria for more clarity. This effort may include coordinating with the Disability Network Partners to leverage resources.
- Through OVR's Job Club Pilot Project, the Employment Specialist and supporting VR Counselors will provide career coaching and mentorship and work preparation services that meet the individual needs of participants committed to achieving their chosen vocational goals. Training areas may include: soft skills, job search, interviewing skills, confidence building, resume writing, problem solving, conflict resolution, etc.
- Continue to utilize OVR's social media platforms to highlight consumer and employer success stories as well as keep the communities updated on current program information and resources.

- In an effort to minimize language barriers, consider the translation of program information and materials into various languages to improve understanding of the VR program by a wider audience.
- Study and analyze the factors contributing to the VR rehabilitation rate and develop and implement a plan for improvement.
- The hiring of additional qualified staff to address increasing caseloads to be considered based on funding availability.
- In light of the dwindling local economy due to natural disasters including COVID-19, it is imperative that OVR seeks out other sources of funding to support additional programs as well as meet the agency's growing needs (e.g., technology, accessibility, health/safety, etc.).
- Continue to invest resources towards professional development activities to increase the knowledge, skills, and abilities of VR professionals and paraprofessionals (e.g., training in basic ASL, etc.)
- Identify and collaborate with external resources to provide benefits planning and counseling to OVR's participants.
- Develop and/or strengthen relationships or partnerships with departments, agencies, or other entities that will help to contribute to OVR's overall program success (e.g., Veterans Affairs Office, Community Guidance Center, Medicaid, Center for Living Independently, etc.)
- Collaborate with higher education partners to create and offer a personal attendant care training program. This will help to expand community rehabilitation programs by making available extended services in the CNMI.
- In an effort to minimize delays in the provision of VR services (e.g., complex rehabilitation technology, WET, etc.), OVR will reach out to government agencies (e.g., Finance) to discuss and/or negotiate a plan to streamline the procurement process.
- Explore opportunities to identify qualified individuals or established vendors (including off-island) to provide ASL services to improve accessibility during OVR and/or DNP-sponsored community events (e.g., conferences, training, and workshops).
- OVR will review existing MOUs to determine if there is a need for any updates.
- OVR will continue its good faith efforts to collaborate and coordinate with WIOA core programs on shared cases and costs in an effort to leverage resources.
- OVR will monitor and evaluate performance through its internal controls in accordance with federal rules and regulations.
- OVR will conduct service record reviews on a quarterly basis consistent with federal requirements. This practice will ensure that case files contain the required supporting documentation to satisfy the RSA-911 reporting.
- OVR will collaborate with the local educational agency as appropriate in the provision of pre-employment transition services as well as ensure the accurate capturing and reporting of the five required activities in accordance with federal regulations.
- OVR will ensure that its financial reports are accurate, complete, and submitted in a timely manner.

- During this global pandemic era, OVR will safely administer its programs as outlined in its internal protocols and overtime make the necessary adjustments as appropriate in accordance with CNMI COVID-19 Task Force guidelines and RSA guidance.

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

- All VR services, including AT assessment/evaluation, devices and services will be provided in the context of an approved IPE.
- At intake and application for VR services as well as in the IPE development stage, VR counselors will ensure to capture information pertaining to the applicant or consumer's need for assistive technology to facilitate the achievement of their competitive integrated employment.
- VR professionals and paraprofessionals will engage the participation of applicants and consumers to identify and maximize comparable benefits such as the Assistive Technology Center for AT loan, demonstration, re-utilization, and trainings (e.g., software, communication tools, etc.). The Public School System-Special Education Program (PSS-SPED) AT expert, if any, will be utilized to provide assessment to students with disabilities. If this is not feasible, then OVR will utilize any of its approved vendors to provide diagnostic assessment or IPE-approved service.
- During IEP meetings of students with disabilities, VR professionals (e.g., Transition Specialist, VR Counselor) will work with our school and/or other community partners to address any significant AT needs of the students especially mutual clients.
- OVR consumers who are residing in Tinian and Rota and who are in need of assistive technology devices or equipment will be provided with the AT after exploring comparable benefits (e.g., Medicaid/Medicare, private insurance, etc.) through an approved IPE that takes into consideration shipping and handling costs for the ATs transport to the outer island of their residence.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

- OVR will strengthen its collaboration with community partners including the CNMI Center for Living Independently, Community Guidance Center, the Behavioral Health Planning Council, the local Autism Society, the Council on Developmental Disabilities, and the Public School System-Special Education Program (PSS-SPED) to identify outreach activities and serve individuals with the most significant disabilities. As expressed in the previous VR State plan, there is no need to specifically target minority individuals in the CNMI because the population are members of minority groups. Nevertheless, OVR will improve on efforts to facilitate information dissemination via the native languages of Chamorro and Carolinian as well as those of other Pacific islands and Asian countries.
- Conduct triennial comprehensive statewide needs assessment.
- Ongoing communication and interaction with community stakeholders comprised of individuals with disabilities and their family members, service providers, and the Disability Network Partners.

- Involvement/engagement at disability public hearings or forums to obtain feedback from minorities and those unserved or underserved to better understand their needs to achieve competitive integrated employment and to live meaningful independent lives.
- Partner with the Northern Marianas College to train individuals to become certified personal care attendants to support the needs of program participants with the most significant disabilities. OVR may consider entering into a business agreement with individuals who successfully complete the training program in an effort to help expand community rehabilitation programs for greater access to rehabilitation services.

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)

OVR has developed the following methods to be used to improve and expand VR services for students with disabilities for Program Year 2020-2023. These methods target improving procedures and processes to achieve the program's priorities and goals, consistent with the most recent comprehensive statewide assessment, SRC recommendations and relevant reports.

- OVR will continue to participate in discussions with the Public School System-Special Education Program (PSS-SPED) via the SESAP (Special Education State Advisory Panel) forums.
- OVR will work with partners to strengthen and solidify the newly-formed CNMI Transition Coalition comprised of partners from the OVR,PSS-SpEd, Council on Developmental Disabilities, Northern Marianas Protection & Advocacy Systems, Inc., University Centers for Excellence in Developmental Disabilities, etc. whose overarching mission is to collaborate to the maximum extent possible to meet the transition needs (e.g., pre-employment transition services) of students with disabilities resulting in the achievement of competitive integrated employment, continued education, and/or independent living.
- VR staff will make regular contact with a designated PSS-SpEd liaison so as to strengthen camaraderie and ensure that each stakeholder is on the same page as to what the transition issues and/or needs are and the effective methods for delivering on quality and timely transition/pre-employment transition services.
- VR staff will attend as many IEP meetings as practicable, upon invitation, and will make a concerted effort to start introducing the VR program to families and students as early as age 14. (Transition Planning could be provided to students as early as age 14 whereas Transition Services including Pre-Employment Transition Services are provided to students 16 to 21.)
- VR staff will continue to participate in job/career fairs where students with disabilities will be actively participating.
- OVR will continue to collaboratively support the activities of the PSS-SpEd, Co-Op Education & Training Program, etc. that prepare students with disabilities for employment, such as: job shadowing, mentoring, career exploration activities, work-based learning experiences, work readiness training, etc.

- OVR will continue to conduct co-locations at the public high schools including the Northern Marianas College to be able to provide another forum in which students with disabilities could seek out and apply for VR services. The co-locations also allow VR staff to further engage in discussions with school personnel on how to better coordinate efforts toward the provision of transition/pre-employment transition services.
- Develop/improve strategies for individuals with intellectual disabilities and individuals with the most significant disabilities to live independently, participate in postsecondary education, and obtain and retain competitive integrated employment.
- Collaborate with Independent Living Centers to disseminate information related to Independent Living Center transition services for out-of-school youth.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

CNMI OVR will continue discussions with community partners/stakeholders for the ongoing exploration and identification of vendors for inclusion in our local CRP network of providers. OVR will continue to identify vendors qualified to meet the needs of students with disabilities transitioning to post-secondary options such as employment (e.g., Pre-Employment Transition Services). As well, CRP expansion will require looking into vendors who may be able to provide specialized services such as ASL, personal assistance, job coaching, etc.

Expanding CRPs in the unserved and/or underserved municipalities of Tinian and Rota must be prioritized as services (e.g., AT assessments, personal assistance services, mental health services, job coaching) are minimal to none. OVR, with the support of the DNP, could advocate for tax incentives to expand vendors' availability through the establishment of satellite offices, for example.

To ensure timely delivery of VR services (e.g., complex rehabilitation technology, WET, etc.), OVR could pursue an MOU with government partners (e.g., Finance) to expedite procurement processes for VR-related services or products ordered through the CRP network.

To address the very limited services available to support the mental health needs of Veterans, OVR could collaborate with the Veterans Affairs Office and the Office of U.S. Congressman Gregorio Kilili Sablan to (1) address the needs of Veterans with service-related disabilities and (2) expand CRPs for the provision of mental health related services.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

- Evaluate current OVR Tracking System and modify as necessary to be able to efficiently record performance measures data. Jill Derickson (OVR Tracking Programmer) will update OVR Tracking System if needed with RSA 911 Elements.
- Communicate with WIOA core program partners in obtaining and tracking data provided consumer consent is obtained.
- Run error report in OVR Tracking System and correct errors before submitting to RSA 911 portal.
- RSA 911 portal will show other errors, not captured in the OVR Tracking System. Correct errors and if completed, RSA 911 portal will accept RSA report.
- Internal Controls and staff training will be completed by 03/25/22.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

- a. In collaboration and coordination with community partners, OVR will support the training activities through a cost-sharing arrangement/agreement with the statewide workforce development system that aims to increase knowledge of best practices in assisting individuals with disabilities to achieve competitive integrated employment and strategies for effective employer involvement/engagement in the process.
- b. Participate in training and employment activities or initiatives organized by the CNMI Department of Labor.
- c. Maintain and strengthen relationships with the Northern Marianas Technical Institute for continued referrals of VR clients to NMTI for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the trades school in the area of reasonable accommodations and effective communications with individuals with varying disabilities.
- d. Increase opportunities for shared-funding on WIA cases thereby demonstrating improved coordination and an overall greater partnership.
- e. Continue the representation of WIA and/or DOL on the State Rehabilitation Council (SRC) as well as VR's representation on the State Workforce Development Board.
- f. OVR to engage in meaningful discussions with the State workforce development board regarding an all-inclusive workforce that integrates quality services for people with disabilities in pursuit of competitive integrated employment.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

- Directly through VR staff
- In collaboration with the CNMI Disability Network Partners including the WIOA Core Programs with regards to the implementation of the VR State Plan
- Through the identification and utilization of comparable services/benefits to the maximum extent possible or allowable
- Through the Agency's existing infrastructure such as the enhanced OVR Tracking System (aka case management system)
- Through a quarterly evaluation and review of progress toward meeting State Plan goals and objectives by OVR's Leadership Team
- Through continuous program improvement efforts to improve overall agency performance
- Through guidance and direction provided by our technical assistance providers including VRTAC-QE, VRTAC-QM, NTACT, and RSA
- In consultation with the CNMI State Rehabilitation Council
- Through OVR's approved CRP network of qualified providers.
- Through ongoing dialogue with various CNMI stakeholders such as program participants, employers, family members, service providers, policymakers, DNP, etc. regarding the VR program and recommendations for improvement.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Support Council-related activities in the form of: Staff support; travel by Council members to attend conferences, meetings, and trainings; Personal attendant; Board member compensation; Facilities rental for meeting and training sessions; Consultant fees for training and policy development; Meeting materials, supplies, and advertising costs; Printed materials for public awareness/information; etc. Total spent on SRC I&E activities in PY 2020 is \$7867.75.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

CNMI OVR is committed to serving its clients in an equitable and timely manner through the provision of quality services so that they may achieve competitive integrated employment and live full and productive lives in their community. In the most recently conducted Comprehensive Statewide Needs Assessment, OVR recognizes the various potential barriers and strategies to accessing and participating in the VR program statewide and some of these include:

Barriers identified through the Individuals with Disabilities Survey to Accessing Employment and Employment-related Goals:

- OVR's Job Club Pilot Project will address participants' need for training in the areas of job search, resume building, interviewing skills, and various soft skills as well.
- During an economic downturn, OVR will encourage participants to pursue post-secondary education at the Northern Marianas College and vocational education/training at the Northern Marianas Technical Institute to increase skillsets and earn credentials that will greatly help them to prepare for when the economy is showing signs of healthy improvement. Additionally, OVR will maximize their WET and OJT trainings to help introduce clients to the world of work as well as learn specific occupational skills, respectively.
- OVR will invest its resources to ensuring that program materials are produced in various language to assist English language learners. Also, OVR will ensure that their program information and materials are provided in accessible formats upon request.
- OVR will continue to collaborate with the DNP to ensure that both employers and individuals with disabilities and their family members are educated on the laws pertaining to reasonable accommodations. OVR's Job Club Pilot Project will also assist in this effort to educate clients on advocating for one's accommodation needs.
- VR Counselors will encourage participants to enroll in educational and training programs should this be a service that will best prepare them for achieving their competitive integrated employment goals.
- To address employers' perceptions and/or attitudes towards individuals with disabilities, OVR will propose the following strategies to help overcome this barrier:
 - Continue to educate employers about the abilities and capabilities of people with disabilities through annual forums sponsored by the DNP
 - OVR will continue to provide Etiquette Training to employers who will be participating in the WET and OJT programs.
 - Utilize social media platforms to the maximum extent possible to showcase consumer and employer success stories throughout the year.

- Enhance OVR's website to include various resources and materials that help to increase employer awareness about disability employment.
- SRC will assist OVR to engage employers in a discussion about how to best meet their business needs as well as the employment needs of participants (SRC Employer Forums).
- OVR will increase its participation and networking at employer association meetings such as the Chamber of Commerce, SHRM, HANMI, and Rotary Club.
- Consumers will have increased access to WET and OJT training programs to address the lack of job skills identified as a barrier. In addition, NMC and NMTI will help with academic and technical skills for participants to advance in their chosen vocational/career fields. Furthermore, VR Counselors will identify and as appropriate integrate computer literacy skills into the IPE to enhance skillsets.
- Transportation barriers will be addressed through the provision of transportation services consistent with an approved IPE. OVR supports the transportation needs of program participants who primarily are actively engaged in a training program as well as those newly-hired up until their fifth paycheck.

Barriers to accessing OVR services as identified in the most recent comprehensive statewide needs assessment:

- Insofar as OVR's physical location is concerned, there isn't much that we can do to change it. However, participants are provided with transportation services through an approved IPE to meet with VR Counselors as necessary in their Navy Hill location. Also, if needed, VR Counselors make the effort to meet with clients at their residence as an accommodation.
- Another barrier identified was difficulty meeting VR Counselors. During this time of ongoing global pandemic, in-person meetings may be limited. However, meetings via other methods (e.g., telephone, email, WhatsApp, Zoom, etc.) are offered with accommodations provided on a case-by-case basis.
- Language may be a barrier for some participants or individuals who may be interested in pursuing VR services. Reasonable efforts will be made to produce program information and materials in various languages. Also, as part of professional personnel development, staff interested in learning a new language spoken in the CNMI including ASL will be supported.

Focus group participants – comprised of individuals with disabilities, disability network partners, and OVR staff – also shed some light on barrier issues that may be adversely impacting OVR's general performance:

- *Lengthy procurement days.* OVR could work with the Department of Finance, for instance, and negotiate a streamlined process for procuring certain VR services such as assistive technology and WET personnel actions of program participants.
- *Confusion about OVR's programs, services, and eligibility requirements.* OVR will fare well if they continue to emphasize this information during their outreach activities for better understanding and clarity.
- *DNP observed shortage of staff / counseling staff appeared overwhelmed.* OVR continues to assess the need for additional staffing and balancing that with funding availability. In the current program year, OVR has implemented a mental health day for staff to take a break and re-energize, especially during stressful times brought on by the pandemic.

- *Some partners felt disconnected from OVR.* Current management and staff of OVR continue to make good faith efforts toward strengthening partnerships with the Disability Network. It is the intention of OVR to continue its good faith collaboration efforts in the expansion of outreach opportunities.
- *Need for soft skills and confidence building training.* Newly-launched Job Club Pilot Project will be addressing this need and much more to enhance participants' employability skills.
- *Social media to highlight consumer and employer success stories.* OVR's social media platforms will be maximized to showcase both consumer and employer success stories. One of the benefits of this is the dispelling of any myths or preconceived notions about individuals with disabilities.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

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

Basic Support Services:

Goal 1: Improve overall Agency performance.

Objective 1.3: In PY 2020, OVR will continue to support the training and/or education of VR staff.

Extent achieved: Ongoing

Strategies:

- Support the personnel development of VR professionals and paraprofessionals especially in the areas of marketing the VR program, engaging employers, supported employment, customized employment, pre-employment transition services, work incentives counseling and benefits planning, etc.

Objective 1.4: In PY 2020, VR staff will continue their monthly outreach activities in Tinian and Rota. (Note: OVR will aim to utilize to the maximum extent possible public service announcements in the radio and/or newspaper regarding outreach activities in the 3 official languages of the CNMI.)

Extent achieved: Ongoing.

Strategies:

- In PY 2020, VR Counselors made two (2) trips to Tinian and three (3) trips to Rota.
- Ensure continued effective collaboration with internal and external staff with respect to travel preparations.
- Continue monthly outreach activities in Tinian and Rota, and continue with positive working relationships with the Mayors' Offices to ensure effective services to people with disabilities.

Objective 1.5: In PY 2020, consumers exiting the VR program in ST 26 will report the following:

- 90% will report satisfaction with the quality of services received, and
- 90% will report that services were received in a timely manner.

Extent achieved: Objective met

Strategies:

- In PY 2020, 92% of respondents reported satisfaction with the quality of services received, and 100% reported that services were received in a timely manner.
- Support activities that will increase self-advocacy skills of people with disabilities.
- Ensure that clients are progressing through the VR process in a timely manner.
- OVR will ensure timely communication with clients throughout the VR process.
- Continue the provision of supported employment services to consumers with most significant disabilities.

Objective 1.9: In PY 2020, OVR is under an agreement with the DOL/WIOA Program regarding use of their office space in Tinian and Rota for VR counselors' monthly outreach activities in an effort to demonstrate increased collaboration between the 2 programs.

Extent achieved: Objective Partially Met

Strategies:

- Starting in PY 2020, OVR in this pandemic era has been providing services by phone or virtually to ensure safety of staff and consumers. OVR plans in the near future to utilize the labor office in Tinian for its monthly outreach activities.
- Starting in PY 2020, OVR in this pandemic era has been providing services by phone or virtually to ensure safety of staff and consumers. OVR plans in the near future to resume utilizing a space that is allocated by the Rota Mayor's Office for its monthly outreach activities.
- Continue monthly outreach activities in Tinian and Rota, and continue with positive working relationships with the Mayors' Offices to ensure effective services to people with disabilities.
- Coordinate with partners on outreach activities to better maximize resources and expertise as well as strengthening relationships with each other.
- Review existing MOUs with partners annually to ensure collaboration and coordination, addressing gaps in services, etc. to ensure maximum vocational outcomes.

Objective 1.9.A: In PY 2020, OVR will support the activities of The Lady Diann Torres Foundation Disability Center to increase program awareness, to network with various stakeholders including people with disabilities and employers, to provide training opportunities to increase knowledge, skills, and abilities, to increase referrals to OVR, to share program data with partner agencies, and/or to support other related activities that promote independence, productivity, inclusion, integration and self-sufficiency of individuals with disabilities in our communities.

Extent achieved: Objective-Ongoing

Strategies:

- Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).
- Coordinate with partners on outreach activities to better maximize resources and expertise as well as strengthening relationships with each other.
- In collaboration and coordination with various community partners, meet the training needs of employers in the public and private sectors in the areas of reasonable accommodations, the benefits of hiring qualified people with disabilities, tax incentives for hiring individuals with disabilities and making workplaces accessible, etc.

Goal 2. Facilitate the seamless transition of students/youth with disabilities to employment or continued education through coordination and collaboration with WIOA core and other programs.

Objective 2.1: In PY 2020, OVR will conduct at least one (1) outreach activity per high school per school year in an effort to educate students and parents about the pre-employment transition services program.

Extent achieved: Objective met

Strategies:

- VR staff will make regular contact with PSS-SPED staff so as to strengthen camaraderie and ensure that each stakeholder is on the same page as to what the transition issues and/or needs are and the effective methods for delivering on quality and timely transition/pre-employment transition services.
- VR staff will continue to participate in job/career fairs where students with disabilities will be actively participating.
- Meet regularly with various partners including public and/or non-profit groups or organizations to discuss implementation and cost-sharing of pre-employment transition services to students with disabilities to better equip them for the workforce.
- OVR will support the activities of the PSS-SpEd, Co-Op Education & Training Program, etc. that prepare students with disabilities for employment, such as job shadowing, mentoring, career exploration activities, work-based learning experiences, work readiness training, etc.
- OVR will continue to conduct co-locations at the public high schools including the Northern Marianas College to be able to provide another forum in which students with disabilities could seek out and apply for VR services. The co-locations also allow VR staff to further engage in discussions with school personnel on how to better coordinate efforts toward the provision of transition/pre-employment transition services.
- OVR will collaborate with PSS-SpEd and/or other stakeholders to develop and conduct at least annually, pre-employment transition services Authorized Activities to identify needs and gaps in Transition and PreETS.
- OVR to conduct outreach and attended IEP meetings at high schools.
- Attend IEP meetings of students with disabilities beginning at the age of 14 to introduce early on the VR program and to establish better coordination with the public schools in the provision of transition services.
- Maintain a "Student's Page" on OVR's website including specific information about pre-employment transition services.

- Develop a communication process to ensure the dissemination of PreETS information to students with disabilities and their families to increase awareness of OVR's mission and services.
- Conduct outreach to the Center for Living Independently (CLI) to provide student transition services to student consumers.

Objective 2.3: In PY 2020, OVR will attend at least ninety percent (90%) of IEP meetings invited to.

Extent achieved: Objective met

Strategies:

- OVR attended IEP meetings at a rate of 92%. OVR and PSS SpEd teachers streamlined the communication and tracking process for IEP scheduling and invitations. Furthermore, outreaches were conducted towards the latter part of the school year 2020. To make OVR visible with High School students in an effort to introduce its services to them
- VR staff will attend as many IEP meetings as practicable, upon invitation, and will make a concerted effort to start introducing the VR program to families and students as early as age 14. (Transition Planning could be provided to students as early as age 14 whereas Transition Services including Pre-Employment Transition Services are provided to students between ages 16 to 21.)
- Attend IEP meetings of student with disabilities beginning at the age of 14 to introduce early on the VR program and to establish better coordination with the public schools in the transition services.

Objective 2.6: In PY 2020, OVR will conduct at least one (1) co-location activity per high school per school year as well as at the Northern Marianas College and Northern Marianas Technical Institute to increase student participation and engagement with VR. (Note: Co-locations make it possible for students to participate in the OVR intake and application process. These are also opportunities for OVR to improve networking and strengthen partnerships with school personnel to ensure successful transition outcomes. As well, co-locations provide a forum for Q&A by school staff, parents/guardians, and students with OVR staff.)

Extent achieved: Objective-Partially met

Strategies:

- PY 2020 VR counselors completed an average of 7 co-locations per site per year.
- OVR will re-establish connections with school administrators and special education teachers in order to continue to conduct co-locations at the public high schools including to conduct co-locations at the public high schools including the Northern Marianas College and Northern Marianas Technical Institute so that to be able to provide another forum in which students with disabilities could seek out and apply for VR services. The co-locations also allow VR staff to further engage in discussions with school personnel on how to better coordinate efforts toward the provision of transition/pre-employment transition services.
- Co-location was not possible at the Northern Marianas Technical Institute due to a transition period NMtech was experiencing.

Objective 2.7: In PY 2020, OVR will continue to collaborate with the Council on Developmental Disabilities (CDD) and Transition Coalition to implement a best practice model in the CNMI high schools (CIRCLES or other models).

Extent achieved: Objective met - Ongoing

Strategies:

- Continue collaboration with CDD and the Transition Coalition to implement best practices model in the CNMI high schools (CIRCLES).
- Implementation of CIRCLES in Kagman high school (pilot school) in PY 2019, with Saipan Southern High adopting CIRCLES this PY 2020.
- OVR has participated in CIRCLES presentations at Kagman high school and discussions are still taking place on full implementation in the four other high schools.

Goal 3. Strengthen partnerships with employers to identify and provide opportunities for competitive integrated employment to VR clients including students with disabilities.

Objective 3.2: In PY 2020, OVR - in collaboration with the Disability Network Partners - will develop or adopt at least one (1) public awareness campaign to engage CNMI employers.

Extent achieved: Objective met

Strategies:

- In PY 2020, OVR had flyers and informational brochures hand-delivered to all major businesses (10 or more employees) on the islands.
- Conducted presentations to the Rotary, Chamber of Commerce, SHRM and the Hotel Association of the Northern Mariana Islands (HANMI).
- Utilize the SRC general membership meetings as a forum to engage employers.

Objective 3.7: In PY 2020, OVR - in collaboration with the SRC and business partners - will disseminate at least four (4) disability employment-related information to help increase employer awareness per year.

Extent achieved: Objective met

Strategies:

- In PY 2020, OVR had flyers and informational brochures hand-delivered to all major businesses (having 10 or more employees) on the islands.
- Conducted presentations and disseminated information to the Rotary, Chamber of Commerce, SHRM and the Hotel Association of the Northern Mariana Islands (HANMI).
- Utilize the SRC general membership meetings as a forum to engage employers.
- OVR met this objective through the Rotary club, a survey to employer's, Annual Report distribution and Citizen Centric report.
- Dissemination of information to public and private sector employers to increase their awareness of how VR services could benefit people with disabilities as well as employers.
- Utilize the Saipan Chamber of Commerce website as a repository of disability employment information.

- Participate in job career fairs sponsored by both public and private agencies and private sector businesses.

Goal 4. Improve services that address the needs of people with disabilities served through other components of the statewide workforce development system.

Objective 4.6: In PY 2020, the CNMI WIOA Core Programs will pursue meaningful discussions leading to the development of a memorandum of understanding (MOU) developed and outlining each programs' roles and responsibilities in serving mutual clients in their attainment of competitive integrated employment.

Extent achieved: Objective met

Strategies:

- The CNMI WIOA Core Programs entered into a memorandum of understanding on June 6, 2018. The MOU outlines each programs' roles and responsibilities in serving mutual clients in their attainment of competitive integrated employment.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Objective 1.7: In PY 2020, OVR will continue to support the efforts of the Disability Network Partners' ad hoc committee on accessibility.

Extent achieved: Objective not met

Strategies:

- Meet regularly with various partners including public and/or non-profit groups or organizations to discuss implementation and cost-sharing of PreETS to students with disabilities to better equip them for the workforce as well as accessibility and accommodation needs.
- Supported and worked with VOICES of the CNMI, a self-advocacy group that has presented to the CNMI Legislature advocating for accessibility, especially in public areas such as parks and beaches and businesses.
- Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).

Due to unforeseen circumstances this objective was not met.

Objective 1.8: In PY 2020, in an effort to increase the level of direct services to Tinian and Rota, the core partners will begin discussions on the feasibility of cost-sharing for an employee that can be paid by the Mayor's Office and each agency could share a percentage of the individual's salary and allocate that percentage of work time for the program accordingly.

Extent achieved: Objective not met

Strategies:

- Core partners have discussed various options on cost sharing, but this discussion was tabled when it was identified that Tinian and Rota do not currently have the numbers to justify a full-time position. Cost analysis indicated the programs would be paying more per consumer with this option as opposed to monthly trips to provide direct services.

- An agreement was reached to review this option on a yearly basis to identify whether there was a need for another feasibility study due to a rise in case load numbers.
- Increase opportunities for shared-funding on WIA cases thereby demonstrating improved coordination and an overall greater partnership.

Due to unforeseen circumstances this objective was not met.

Objective 2.2: In PY 2020, OVR will continue to receive intensive technical assistance from the Workforce Innovation Technical Assistance Center (WINTAC) for the effective implementation of pre-employment transition services.

Extent achieved: Objective not met

Strategies:

- PSS SpEd also brought back Michael Stoehr of NTACT for their professional development which also included a half day follow up PreETS training with VR counselors in September 2019.

Due to unforeseen circumstances this objective was not met.

Objective 3.1: In PY 2020, OVR - in collaboration and coordination with the Disability Network Partners and/or other community partners - will continue to educate 15 and 20 employers, respectively, on the ability of OVR consumers and the potential for all individuals with disabilities in the CNMI.

Extent achieved: Objective not met

Strategies:

- In PY 2020, OVR met and educated 74 employers on the abilities of OVR consumers and their potential.
- Disseminate information to public and private sector employers to increase their awareness of how VR services could benefit people with disabilities as well as employers. Utilize the Saipan Chamber of Commerce's website as a repository of disability employment information.
- Engage employers in identifying OJT and/or job placements for VR consumers.
- Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).
- In collaboration and coordination with various community partners, meet the training needs of employers in the public and private sectors in the areas of reasonable accommodations, the benefits of hiring qualified people with disabilities, tax incentives for hiring individuals with disabilities and making workplaces accessible, etc.

Due to unforeseen circumstances and the COVID-19 Pandemic, this objective was not met.

Objective 3.3: In PY 2020, OVR will participate in at least two (2) job/career fairs sponsored by public and/or private entities per year.

Extent achieved: Objective not met

Strategies:

- In PY 2020, OVR participated in five (5) job fairs sponsored by both the private and public sectors.

- Continuation of partnerships with WIOA partners, PSS, NMC and the private sector for ongoing participation in job/career fairs.

Due to the COVID-19 Pandemic, this objective was not met.

Objective 3.6: In PY 2020, OVR - through the State Rehabilitation Council - will continue to engage employers by hosting an Employer Forum at all Council general membership meetings.

Extent achieved: Objective- not met

Strategies:

- OVR to present at the SRC quarterly general membership meetings.
- Utilize the SRC general membership meetings as a forum to engage employers.

Due to unforeseen circumstances this objective was not met.

Objective 4.1: In PY 2020, OVR will continue to engage in meaningful discussions with WIOA Core Program Partners and other team members regarding the development and/or implementation of a common case management system to track and report the participation and progress of consumers co-enrolled in the WIOA Core Programs.

Extent achieved: Objective not met

Strategies:

- Trainings are still ongoing for the common case management system adopted by the WIOA core partners (GeoSolutions).

Due to unforeseen circumstances this Objective was not met.

Objective 4.3: In PY 2020, OVR - in collaboration with the WIOA Title I Program - will conduct at least one (1) cross training for staff on progress flow and processes per year.

Extent achieved: Objective not met

Strategies:

- Trainings are still ongoing for the common case management system adopted by the WIOA core partners (GeoSolutions).
- GeoSolutions has been in continuous contact with Core Programs on the unique needs of each of the programs in the CNMI, to ensure that the progress flow and processes are captured and meets the needs of the respective programs.

Due to unforeseen circumstances this objective was not met.

Objective 4.7: In PY 2020, OVR will collaborate with the CNMI Workforce Development Board towards the creation and implementation of a physical or virtual American Job Center (aka One-Stop) with an MOU in place that will outline the appropriate roles and contributions of resources for all required AJC program partners.

Extent achieved: Objective not met

Strategies:

- The CNMI WIOA Core Programs entered into a memorandum of understanding on June 6, 2018. The MOU stated that the Core Programs through the State Workforce Development Board, agreed to a separate MOU for the American Job Center or One-Stop Center.
- A government owned building was identified in PY 2019 for the location of the AJC. The building was allocated to the Workforce Investment Agency and clearing of the building was initiated. The renovation project was stalled due to a lack of funding. The Core Partners, working with the Office of Grants Management and the State Workforce Development Board have been trying to identify the needed funds to finish the project.

Due to Lack of follow up discussions this objective was not met

- Disconnection with the Disability Network Partners and national technical assistance partners from April 2019 to March 2021 due to new leadership
- Substantial internal challenges from April 2019 to March 2021, multiple staff left the agency due to the working environment under the new leadership from April 2019 to March 2021
- Change in leadership began March 18,2021
- Rebuilding rapport with core partners under the current leadership from March 18,2021 to present
- Repairing and nurturing staff relationship began March 18,2021
- Correcting deficiencies and shifting focus back to the program compliance and transparency beginning March 18,2021 to present.

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

Refer to Section (p) (1)(A) for information

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Refer to Section (p)(1)(B) for information

- Disconnection with the Disability Network Partners and national technical assistance partners from April 2019 to March 2021 due to new leadership
- Substantial internal challenges from April 2019 to March 2021, multiple staff left the agency due to the working environment under the new leadership from April 2019 to March 2021
- Change in leadership began March 18,2021
- Rebuilding rapport with core partners under the current leadership from March 18,2021 to present
- Repairing and nurturing staff relationship began March 18,2021

- Correcting deficiencies and shifting focus back to the program compliance and transparency beginning March 18, 2021 to present

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

Table 1. Employment (Second Quarter after Exit)

To calculate the employment rate: The number of participants who exited during the reporting period who are found to be employed, either through direct Unemployment Insurance (UI) wage record match or supplemental wage information, in the second quarter after the exit quarter DIVIDED by the number of participants who exited during the reporting period.

Program	PY 2022 Proposed/ Expected Level	PY 2022 Negotiated/ Adjusted Level	PY 2023 Proposed/ Expected Level	PY 2023 Negotiated/ Adjusted Level
Adults	Baseline	30.00	Baseline	33.00
Dislocated Workers	Baseline	30.00	Baseline	33.00
Youth	Baseline	35.00	Baseline	38.00
Adult Education	Baseline	9.00	Baseline	9.00
Wagner-Peyser	Baseline	0.00	Baseline	0.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

TABLE 2. EMPLOYMENT (Fourth Quarter after Exit)

To calculate the employment rate: The number of participants who exited during the reporting period who are found to be employed, either through direct Unemployment Insurance (UI) wage record match or supplemental wage information, in the fourth quarter after the exit quarter DIVIDED by the number of participants who exited during the reporting period.

Program	PY 2022 Proposed/ Expected Level	PY 2022 Negotiated/ Adjusted Level	PY 2023 Proposed/ Expected Level	PY 2023 Negotiated/ Adjusted Level
Adults	Baseline	30.00	Baseline	33.00
Dislocated Workers	Baseline	30.00	Baseline	33.00
Youth	Baseline	35.00	Baseline	38.00
Adult Education	Baseline	9.00	Baseline	9.00
Wagner-Peyser	Baseline	0.00	Baseline	0.00
Vocational	Baseline	Baseline	Baseline	Baseline

Program	PY 2022 Proposed/ Expected Level	PY 2022 Negotiated/ Adjusted Level	PY 2023 Proposed/ Expected Level	PY 2023 Negotiated/ Adjusted Level
Rehabilitation				

Table 3. Median Earnings (Second Quarter after Exit)

Program	PY 2022 Proposed/ Expected Level	PY 2022 Negotiated/ Adjusted Level	PY 2023 Proposed/ Expected Level	PY 2023 Negotiated/ Adjusted Level
Adults	Baseline	2,700.00	Baseline	2,900.00
Dislocated Workers	Baseline	2,700.00	Baseline	2,900.00
Youth	Baseline	0.00	Baseline	0.00
Adult Education	Baseline	0.00	Baseline	0.00
Wagner-Peyser	Baseline	0.00	Baseline	0.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 4. Credential Attainment Rate

A recognized postsecondary credential is defined as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal government, or an associate, baccalaureate degree, or post-graduate degree. A recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills are generally based on standards developed or endorsed by employers or industry associations.

Program	PY 2022 Proposed/ Expected Level	PY 2022 Negotiated/ Adjusted Level	PY 2023 Proposed/ Expected Level	PY 2023 Negotiated/ Adjusted Level
Adults	Baseline	63.00	Baseline	66.00
Dislocated Workers	Baseline	63.00	Baseline	66.00
Youth	Baseline	72.00	Baseline	75.00
Adult Education	Baseline	0.00	Baseline	0.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 5. Measurable Skill Gains

The measurable skill gains (MSG) indicator is used to measure the interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs.

Participants may receive annual MSG for advancement through a program. For example, an annual MSG can be gained as a participant advances through college, assuming necessary requirements are met.

Program	PY 2022 Proposed/ Expected Level	PY 2022 Negotiated/ Adjusted Level	PY 2023 Proposed/ Expected Level	PY 2023 Negotiated/ Adjusted Level
Adults	Baseline	0.00	Baseline	0.00
Dislocated Workers	Baseline	0.00	Baseline	0.00
Youth	Baseline	0.00	Baseline	0.00
Adult Education	Baseline	32.00	Baseline	34.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 6. EFFECTIVENESS IN SERVING EMPLOYERS

The Effectiveness in Serving Employers indicator is a shared indicator across the six core programs within the state. The purpose of sharing the indicator is to ensure that the core programs within the state are using a holistic approach to serving employers. This measure is being piloted to test the feasibility of the three proposed approaches prior to developing a standardized indicator.

State VR agencies will be able to use RSA-911 data element 392 in order to determine the retention with the same employer in the 2nd and 4th quarters after exit. This information can be calculated based on information calculated from state wage records.

Program	PY 2022 Proposed/ Expected Level	PY 2022 Negotiated/ Adjusted Level	PY 2023 Proposed/ Expected Level	PY 2023 Negotiated/ Adjusted Level
Adults	Baseline	0.00	Baseline	0.00
Dislocated Workers	Baseline	0.00	Baseline	0.00
Youth	Baseline	0.00	Baseline	0.00
Adult Education	Baseline	0.00	Baseline	0.00
Wagner-Peyser	Baseline	0.00	Baseline	0.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 7. Combined Federal Partner Measures

Measure	PY 2022 Proposed/ Expected Level	PY 2022 Negotiated/ Adjusted Level	PY 2023 Proposed/ Expected Level	PY 2023 Negotiated/ Adjusted Level
Employment	8.00	8.00	8.00	8.00
Median Earnings	7,500.00	7,500.00	7,500.00	7,500.00
Credential Attainment	58.00	58.00	58.00	58.00
Measurable Skills Gain	Baseline	TBD	Baseline Adjusted	TBD

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

Innovation and Expansion (I&E) funding was used, in accordance with federal regulation, to provide for allowable activities for the State Rehabilitation Council (SRC). Consistent with OVR goals and priorities, I&E efforts continue to promote competitive integrated employment outcomes for students and youth with disabilities, extend the community's capacity to serve persons who are blind or visually impaired, and integrate employment outcomes for persons with developmental disabilities. During PY 2020, the SRC spent \$7,867.75 from I&E funding to carry out their allowable activities.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

The CNMI OVR will continue its efforts to provide supported employment (SE) services to individuals with the most significant disabilities to achieve meaningful employment per their IPE goal. The Office continues to negotiate with both private firms and public agencies to identify opportunities for competitive integrated employment outcomes for clients participating in this program. OVR currently utilizes two (2) private firms to provide personal assistance services for supported employment consumers (RJ Corporation and Marianas Health). As well, consumers may select private citizens/individuals (e.g., family members) to provide PA services as a comparable benefit or through a paid stipend. Where job coaching is concerned, OVR is looking to identify a qualified individual or vendor to provide this service through a fee for service agreement. In the interim, OVR's Employment Specialist will be utilized to provide job coach services on an as needed basis. The limited number of community rehabilitation programs (CRPs) and extended employment service providers in the CNMI pose a significant challenge to providing a full range of services to consumers who are most significantly disabled. Should Title VI, Part B funds not be made available to VR agencies in PYs 2022-2023, OVR will utilize Basic Support Title I funding for the provision of supported employment services.

Quality of Supported Employment: Supported Employment services are coordinated by VR professionals in collaboration with community rehabilitation program providers such as Marianas Health and RJ Corporation as well as through individual vendors chosen by VR clients themselves to provide the needed personal assistance services at the job site to further maintain competitive integrated employment for the duration allowed by law. Job coaching services may be provided by OVR's Employment Specialist until such time OVR identifies a qualified vendor to provide this service to participants with most significant disabilities. Ongoing monitoring of Supported Employment cases will be conducted to evaluate the timeliness, appropriateness,

and effectiveness of service delivery to VR clients including students and youth with the most significant disabilities.

Scope of Supported Employment Services: Services intended to support the competitive integrated employment of VR clients including students and youth with the most significant disabilities include job coaching services, personal assistance services on the job, assistive technology, and other post-employment services necessary for job preservation. Natural supports provided by the employer to assist an individual with most significant disabilities to maintain employment may be considered a type of supported employment service. Per program policy, other ongoing support services for participants with most significant disabilities include: supplemental assessment to rehabilitation needs, job development and training, social skills training, regular observation or supervision of the client, follow-up services to stabilize the job placement, and any other services similar to the foregoing services.

Extent of Supported Employment Services: The specifics and extent of services needed are determined on an individual basis and written into and provided in the context of an approved Individualized Plan for Employment (IPE). A maximum of twenty-four (24) months of supported employment services may be provided to a consumer with the most significant disabilities, unless a longer period is necessary to meet the individual's needs, to help him/her achieve competitive employment and stability in an integrated work setting. Services may lead to natural supports on the job provided by the supervisor and co-workers as well as supported by family and friends. When the IPE is developed, extended support services are planned in order to assure continued support for the consumers. Services will continue to be provided until such time the consumer's job skills meet the employer's expectations and the job is stable and permanently secured. Family-provided supports may include transportation as well as personal assistance services.

As reported in recent local news, U.S. Sen. Mazie Hirono is interested in looking into lifting the Medicaid cap for the U.S. territories including CNMI. Lifting the cap may mean additional extended services not currently available may be made available to individuals with disabilities who are eligible to receive Medicaid services.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

Timing of transition from supported employment to extended services: The timing of the transition to extended services for VR clients with the most significant disabilities receiving supported employment services from CNMI OVR as part of their approved IPE occurs as soon as the IPE services are completed and the consumer has achieved competitive integrated employment as described in the IPE, or after a period of time not to exceed twenty-four (24) months, whichever comes first. The CNMI OVR may, under special circumstances, extend supported employment services beyond 24 months, if the consumer and the VR counselor agree to extend the time to achieve the desired employment goal as reflected in the approved IPE.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Name of designated State agency or designated State unit, as appropriate: **CNMI Office of Vocational Rehabilitation**

Name of designated State agency: **CNMI Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Arlene M. Reyes**

Title of Authorized Representative: **Director**

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

CNMI Office of Vocational Rehabilitation

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Arlene M. Reyes, OVR Director

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Arlene M. Reyes, OVR Director

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	Arlene M. Reyes
Title of Signatory	Director
Date Signed	03/14/2022

ASSURANCES

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or	

The State Plan must include	Include
designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	

The State Plan must include	Include
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section	

The State Plan must include	Include
102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the	

The State Plan must include	Include
Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of	

The State Plan must include	Include
individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Employment (Fourth Quarter After Exit)	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Median Earnings (Second Quarter After Exit)	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	52.6%	50.0%	52.6%
Employment (Fourth Quarter After Exit)	50.0%	50.0%	50.0%	50.0%
Median Earnings (Second Quarter After Exit)	\$3,200	\$4,200	\$3,200	\$4,200
Credential Attainment Rate	66.5%	80.0%	66.5%	\$80.0%
Measurable Skill Gains	50.0%	75.9%	50.0%	75.9%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

**ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - DISLOCATED PROGRAM
PERFORMANCE INDICATORS**

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	50.0%	50.0%	50.0%
Employment (Fourth Quarter After Exit)	50.0%	50.0%	50.0%	50.0%
Median Earnings (Second Quarter After Exit)	\$3,200	\$4,200	\$3,200	\$4,200
Credential Attainment Rate	66.5%	66.5%	66.5%	66.5%
Measurable Skill Gains	50.0%	71.4%	50.0%	71.4%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	57.8%	50.0%	57.8%
Employment (Fourth Quarter After Exit)	50.0%	50.0%	50.0%	50.0%
Median Earnings (Second Quarter After Exit)	\$3,000	\$4,000	\$3,000	\$4,000
Credential Attainment Rate	66.6%	66.6%	66.6%	66.6%
Measurable Skill Gains	50.0%	70.0%	50.0%	70.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Serving Employers				

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	57.0%	57.0%	58.0%	58.0%
Employment (Fourth Quarter After Exit)	60.0%	60.0%	61.0%	61.0%
Median Earnings (Second Quarter After Exit)	\$4,153.00	4,161.00	\$4,153.00	4,162.00
Credential Attainment Rate	81.0%	50.0%	82.0%	51.0%
Measurable Skill Gains	50.0%	43.0%	51.0%	44.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Employment (Fourth Quarter After Exit)	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Median Earnings (Second Quarter After Exit)	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

ADDITIONAL INDICATORS OF PERFORMANCE

Additional Indicators of Performance
No additional indicators to be included.