Combined State Plan for Nebraska's Workforce System for Program Years 2020 – 2023

(July 1, 2020 – June 30, 2024)

Table of contents

Notes to the reader ... 5
Overview ... 6
Options for Submitting a State Plan ... 6
How State Plan Requirements Are Organized ... 7
I. WIOA State Plan Type and Executive Summary ... 7
a. WIOA State Plan Type ... 7
b. Plan Introduction or Executive Summary ... 8
II. Strategic Elements ... 8
a. Economic, Workforce, and Workforce Development Activities Analysis ... 8
1. Economic and Workforce Analysis ... 8
2. Workforce Development, Education and Training Activities Analysis ... 44
b. State Strategic Vision and Goals ... 52
1. Vision ... 52
2. Goals ... 52
3. Performance Goals ... 53
4. Assessment ... 53
c. State Strategy ... 54
Selection and prioritization of development of career pathways ... 54
Identification of barriers to participation in selected and prioritized career pathways ... 55
Strategies for alignment ... 56
III. Operational Planning Elements ... 58
a. State Strategy Implementation ... 59
1. State Board Functions ... 59
2. Implementation of State Strategy ... 60
b. State Operating Systems and Policies ... 69
1. State operating systems ... 69
2. The State policies that will support the implementation of the State's strategies ... 71
3. State Program and State Board Overview ... 74
4. Assessment and Evaluation of Programs and One-Stop Program Partners ... 77
5. Distribution of Funds for Core Programs ... 78
6. Program Data ... 81
7. Priority of Service for Veterans ... 84
8. Accessibility of the One-Stop Delivery System for Individuals with Disabilities ... 87
9. Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners ... 97
IV. Coordination with State Plan Programs ... 98
V. Common Assurances (For All Core Programs) ... 98
VI. Program-Specific Requirements for Core Programs ... 99
Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B ... 99
a. General Requirements ... 99
b. Adult and Dislocated Workers Program Requirements ... 107
c. With respect to youth workforce investment activities authorized in section 129 of WIOA— ... 111
d. Single-area State Requirements ... 121
e. Waiver Requests (optional) ... 121
Title I-B Assurances ... 121
Adult Program Performance Indicators ... 122
Dislocated Program Performance Indicators ... 123
Youth Program Performance Indicators ... 125
Program-Specific Requirements for Wagner-Peyser Program (Employment Services) ... 126
a. Employment Service Staff ... 126
b. Meaningful assistance ... 127
c. Reemployment assistance ... 128
d. Use of WP funds to support UI claimants and communications between WP and UI ... 129
e. Agricultural Outreach Plan (AOP) ... 130

Wagner-Peyser Assurances ... 137
Wagner Peyser Program Performance Indicators ... 137
Program-specific Requirements for Adult Education and Family Literacy Act Programs ... 139
a. Aligning of Content Standards ... 139
b. Local Activities ... 139
c. Corrections Education and other Education of Institutionalized Individuals ... 141
d. Integrated English Literacy and Civics Education Program ... 142
e. State Leadership ... 142
f. Assessing Quality ... 143
Adult Education and Family Literacy Act Program Certifications ... 144
Adult Education and Family Literacy Act Program Assurances ... 144
Authorizing or Certifying Representative ... 145
Section 427 of the General Education Provisions Act (GEPA) ... 146
Adult Education and Literacy Program Performance Indicators ... 146
Program-Specific Requirements for Vocational Rehabilitation (Combined or General) ... 148
a. Input of State Rehabilitation Council ... 148
b. Request for Waiver of Statewideness ... 150
c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System . 151
d. Coordination with Education Officials ... 153
e. Cooperative Agreements with Private Nonprofit Organizations ... 158
f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services ... 158
g. Coordination with Employers ... 159
h. Interagency Cooperation ... 161
i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development ... 162
j. Statewide Assessment ... 169
k. Annual Estimates ... 175
l. State Goals and Priorities ... 178
m. Order of Selection ... 183
n. Goals and Plans for Distribution of title VI Funds ... 189
o. State's Strategies ... 190
p. Evaluation and Reports of Progress: VR and Supported Employment Goals ... 193
q. Quality, Scope, and Extent of Supported Employment Services ... 196
Vocational Rehabilitation (Combined or General) Certifications ... 197
Assurances ... 198
Vocational Rehabilitation Program Performance Indicators ... 201
Program-Specific Requirements for Vocational Rehabilitation (Blind) ... 202
a. Input of State Rehabilitation Council ... 202
b. Request for Waiver of Statewideness ... 202
c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System . 203
d. Coordination with Education Officials ... 204
e. Cooperative Agreements with Private Nonprofit Organizations ... 210
f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services ... 210
g. Coordination with Employers ... 210
h. Interagency Cooperation ... 212
i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development ... 213
j. Statewide Assessment ... 218
k. Annual Estimates ... 221
l. State Goals and Priorities ... 222
m. Order of Selection ... 224
n. Goals and Plans for Distribution of title VI Funds ... 225
o. State's Strategies ... 225
p. Evaluation and Reports of Progress: VR and Supported Employment Goals ... 229
q. Quality, Scope, and Extent of Supported Employment Services ... 234
Vocational Rehabilitation (Blind) Certifications ... 235
Assurances ... 236
Vocational Rehabilitation Program Performance Indicators ... 239

VII. Program-Specific Requirements for Combined State Plan Partner Programs 240
Temporary Assistance for Needy Families (TANF) 240
a. Conduct a program designed to serve all political subdivisions in the State 240
b. Require a parent or caretaker receiving assistance to engage in work 246
c. Ensure that parents and caretakers receiving assistance engage in work 247
d. Restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act) 250
e. Goals and actions to prevent and reduce out-of-wedlock pregnancies 251
f. Education and training on the problem of statutory rape 252
g. Access to assistance 253
h. Ability to use or withdraw assistance with minimal fees or charges 253
i. Families moving from another State 253
j. Assistance to non-citizens 254
k. Criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment 254
l. Assist individuals to train for, seek, and maintain employment 254
m.MOE-funded services 255
TANF Certifications 257
Employment and Training Programs Under the Supplemental Nutrition Assistance Program (Programs Authorized Under Section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4))) 257
a. General Requirements [27] 257
b. Able-bodied Adults without Dependents (ABAWD) [28] 262
Trade Adjustment Assistance (TAA) 263
Jobs for Veterans' State Grants 263
a. Employment, training and job placement services to veterans and eligible persons 263
c. Duties assigned to DVOP specialists and LVER staff 265
c. The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or American Job Center; 268
d. Incentive Award program 269
e. Populations of eligible veterans to be served 270
f. How the State implements and monitors the administration of priority of service to covered persons; 271
g. How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff: 271
h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and 271
i. Such additional information as the Secretary may require. 271
Unemployment Insurance (UI) 272
a. Contents of a Complete UI SQSP Package 272
b. Requirements for States electing to include UI in the Combined State Plan 298
Senior Community Service Employment Program (SCSEP) 298
a. Economic Projections and Impact 298
b. Service Delivery and Coordination 300
c. Location and Population Served, including Equitable Distribution 306

Notes to the reader

Federally mandated information requirements appear in *italicized* Times New Roman font. Responses to the instructions appear in regular Times New Roman. Table numbers have been standardized throughout the entirety of the plan for ease of reference.

If you experience accessibility issues with this plan, please email the WIOA Policy mailbox at ndol.wioa_policy@nebraska.gov.

Overview

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

Options for submitting a state plan

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

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

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

- *Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)*
- *Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)*
- *Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))*
- *Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))*
- *Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))*
- *Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)*
- *Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)*
- *Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))*
- *Employment and training activities carried out by the Department of Housing and Urban Development*

- *Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))* [1]
- *Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))*

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

How state plan requirements are organized

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

- *The Strategic Planning Elements section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.*
- *The Operational Planning Elements section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:*
    - *State Strategy Implementation,*
    - *State Operating Systems and Policies,*
    - *Assurances,*
    - *Program-Specific Requirements for the Core Programs, and*
    - *Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).*

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.[2] *States must develop strategies that look beyond strategies for the general population and develop approaches that address the needs of target populations. Paperwork Reduction Act: The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.*

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

I. WIOA State Plan Type and Executive Summary

a. WIOA State Plan Type

This Combined State Plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as optional Combined State Plan partner programs identified below.

- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

b. Plan Introduction or Executive Summary

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

This plan does not include an introduction or executive summary.

II. Strategic Elements

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

a. Economic, Workforce, and Workforce Development Activities Analysis

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

1. Economic and Workforce Analysis

A. Economic Analysis

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

i. Existing Demand Industry Sectors and Occupations

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

ii. Emerging Demand Industry Sectors and Occupations

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

iii. Employers' Employment Needs

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

Introduction

The State of Nebraska covers 76,824 square miles, making it the 16th largest state in terms of geographic area[1]. In 2018, Nebraska's population was estimated at 1,929,268, with 55 percent of the state's population concentrated in Douglas, Lancaster, and Sarpy Counties (Omaha and Lincoln metro areas).

Nebraska offers a variety of demand industry sectors and occupations that provide family-sustaining wages; a 93.3 cost of living index that ranked 17th in the nation on average for 2018;[2] and appealing tax incentives for new and existing businesses.

Gross domestic product

Table 1 provides a comparison of the growth of Nebraska's gross domestic product (GDP) to the growth of the national GDP and shows that the percent change in growth of Nebraska's current-dollar[3] and real GDP (in chained 2012 dollars)[4] from year to year for Nebraska increased at a rate lesser than that of the national GDP growth rate.

Table 1. Gross domestic product – all industries: Nebraska/US comparison

Year	Nebraska Real GDP (Millions of chained 2012 dollars)	Nebraska Real GDP % change from previous year	US Real GDP (Millions of chained 2012 dollars)	US Real GDP % change from previous year	Nebraska Current-dollar GDP (millions of current dollars)	Nebraska Current-dollar GDP % change from previous year	US Current-dollar GDP (millions of current dollars)	US Current-dollar GDP % change from previous year
2015	109,673	2.3	17,386,700	2.8	115,056	3.2	18,219,297	3.8
2016	110,226	0.5	17,659,187	1.5	116,056	0.9	18,707,189	2.6
2017	110,526	0.3	18,050,693	2.2	118,546	2.1	19,485,394	4.0
2018	112,170	1.5	18,566,442	2.8	122,966	3.6	20,494,079	4.9

Source: United States Department of Commerce, Bureau of Economic Analysis, "GDP & Personal Income, Regional Data," https://www.bea.gov/iTable/index_regional.cfm [accessed June 13, 2019]

Tables 2, 3, and 4 provide comparisons of GDP growth for the Grand Island, Lincoln, and Omaha-Council Bluffs metropolitan statistical areas (MSAs) against the Nebraska GDP growth rate.

- The percent change for the Grand Island MSA GDP, current-dollar and real (refer to Table 2) lagged behind the state significantly in 2013, 2014, and 2015 and exceeded the state significantly in 2016 and 2017.
- The percent change for the Lincoln MSA GDP, current-dollar and real (refer to Table 3) tracked with the state in 2013 and 2014, exceeded the state in 2015, and lagged behind in 2016 and 2017.
- The percent change for the Omaha-Council Bluffs MSA GDP, current-dollar and real (refer to Table 4) lagged behind the state significantly in 2013 and 2017, exceeded the state significantly in 2014 and 2015, and tracked with the state in 2016.

Table 2. Gross domestic product – all industries: Grand Island MSA/Nebraska comparison

Year	Grand Island MSA Real GDP (Millions of chained 2012 dollars)	Grand Island MSA Real GDP % change from previous year	Nebraska Real GDP (Millions of chained 2012 dollars)	Nebraska Real GDP % change from previous year	Grand Island Current-dollar GDP (millions of current dollars)	Grand Island Current-dollar GDP % change from previous year	Nebraska Current-dollar GDP (millions of current dollars)	Nebraska Current-dollar GDP % change from previous year
2013	4,041	2.2	105,038	2.6	3,624.9	0.0	107,604	5.0
2014	4,068	0.7	107,132	2.8	3,603.5	-0.6	111,331	3.3
2015	4,225	3.7	109,673	1.5	3,698.4	2.6	115,056	3.2
2016	4,334	2.5	110,226	2.2	3,764.5	1.8	116,056	0.9
2017	4,487	3.4	110,526	2.8	3,850.1	2.2	118,546	2.1

Source: United States Department of Commerce, Bureau of Economic Analysis, "GDP & Personal Income, Regional Data," https://www.bea.gov/iTable/index_regional.cfm [accessed June 13, 2019]

Table 3. Gross domestic product – all industries: Lincoln MSA/Nebraska comparison

Year	Lincoln MSA Real GDP (Millions of chained 2012 dollars)	Lincoln MSA Real GDP % change from previous year	Nebraska Real GDP (Millions of chained 2012 dollars)	Nebraska Real GDP % change from previous year	Lincoln MSA Current-dollar GDP (millions of current dollars)	Lincoln MSA Current-dollar GDP % change from previous year	Nebraska Current-dollar GDP (millions of current dollars)	Nebraska Current-dollar GDP % change from previous year
2013	16,028	2.1	105,038	2.6	17,332	4.1	107,604	5.0
2014	16,471	2.7	107,132	2.8	18,174	4.6	111,331	3.3
2015	16,857	2.3	109,673	1.5	19,076	4.7	115,056	3.2
2016	17,054	1.2	110,226	2.2	19,641	2.9	116,056	0.9
2017	17,301	1.4	110,526	2.8	20,246	3.0	118,546	2.1

Source: United States Department of Commerce, Bureau of Economic Analysis, "GDP & Personal Income, Regional Data," https://www.bea.gov/iTable/index_regional.cfm [accessed July 1, 2019]

Table 4. Gross domestic product – all industries: Omaha-CB MSA/Nebraska comparison

Year	Omaha-CB MSA Real GDP (Millions of chained 2012 dollars)	Omaha-CB MSA Real GDP % change from previous year	Nebraska Real GDP (Millions of chained 2012 dollars)	Nebraska Real GDP % change from previous year	Omaha-CB MSA Current-dollar GDP (millions of current dollars)	Omaha-CB MSA Current-dollar GDP % change from previous year	Nebraska Current-dollar GDP (millions of current dollars)	Nebraska Current-dollar GDP % change from previous year
2013	49,900	0.1	105,038	2.6	53,630	2.2	107,604	5.0
2014	52,424	4.8	107,132	2.8	57,554	6.8	111,331	3.3
2015	54,634	4.0	109,673	1.5	61,444	6.3	115,056	3.2
2016	55,723	2.0	110,226	2.2	63,573	3.3	116,056	0.9
2017	56,229	0.9	110,526	2.8	65,052	2.3	118,546	2.1

Source: United States Department of Commerce, Bureau of Economic Analysis, "GDP & Personal Income, Regional Data," https://www.bea.gov/iTable/index_regional.cfm [accessed July 1, 2019]

[1] United States Census Bureau, "QuickFacts Nebraska," https://www.census.gov/quickfacts/NE [accessed June 12, 2019]
[2] Missouri Department of Economic Development, Missouri Economic Research and Information Center, "Cost of Living Data Series Annual Average Series 2018," https://www.missouri economy.org/indicators/cost_of_living/ [accessed June 14, 2019]
[3] Estimates in current dollars are not adjusted for inflation (Source: United States Department of Commerce, Bureau of Economic Analysis, "Regional Economic Accounts: Regional Definitions," https://www.bea.gov/regional/definitions/ [accessed June 13, 2019]).
[4] Real GDP (in chained dollars) by state is an inflation-adjusted measure of each state's gross product based on national prices for the goods and services produced within the state. The real estimates of gross domestic product (GDP) by state are measured in chained (2012) dollars (Source: United States Department of Commerce, Bureau of Economic Analysis, "Regional Economic Accounts: Regional Definitions," https://www.bea.gov/regional/definitions/ [accessed June 13, 2019]).

Personal income

Table 5 provides a comparison of the growth of Nebraska's personal income (all sources) against the growth rate for national personal income (all sources) and shows the percent change in growth for Nebraska. The state tracked near the national rate in 2015 and lagged behind the national growth rate for 2016, 2017, and 2018.

Table 5. Personal income – all sources: Nebraska/US comparison

Year	Nebraska Personal Income (Millions of dollars)	Nebraska Personal Income percent change from previous year	US Personal Income (millions of dollars)	US Personal Income percent change from previous year
2015	95,455	3.8	15,711,634	4.6
2016	94,731	-0.8	16,115,630	2.5
2017	97,557	2.9	16,820,250	4.2
2018	100,534	3.0	17,572,929	4.3

Source: United States Department of Commerce, Bureau of Economic Analysis, "GDP & Personal Income, Regional Data," https://www.bea.gov/iTable/index_regional.cfm [accessed July 2, 2019]

Tables 6, 7, and 8 provide comparisons of the growth rate of personal income for the Omaha-Council Bluffs, Lincoln, and Grand Island metropolitan statistical areas (MSAs) against Nebraska's overall growth rate of personal income.

- The percent change for Omaha-Council Bluffs personal income (refer to Table 6) exceeded the state significantly in 2014 and 2016 and tracked with the state in 2015 and 2017.
- The percent change for Lincoln MSA personal income (refer to Table 7) lagged behind the state in 2014 and exceeded the state in 2015, 2016, and 2017.
- The percent change for Grand Island MSA personal income (refer to Table 8) lagged behind the state significantly in 2014, tracked with the state in 2015 and 2016, and exceeded the state in 2017.

Table 6. Personal income – all sources: Nebraska/Omaha-CB MSA comparison

Year	Nebraska Personal Income (Millions of dollars)	Nebraska Personal Income percent change from previous year	Omaha-CB MSA Personal Income (millions of dollars)	Omaha-CB MSA Personal Income percent change from previous year
2014	91,844	5.6	47,050,932	7.2
2015	95,454	3.8	49,051,027	4.1
2016	94,730	-0.8	49,182,895	0.3
2017	97,556	2.9	50,973,238	3.5

Source: United States Department of Commerce, Bureau of Economic Analysis, "GDP & Personal Income, Regional Data," https://www.bea.gov/iTable/index_regional.cfm [accessed July 2, 2019]

Table 7. Personal income – all sources: Nebraska/Lincoln MSA comparison

Year	Nebraska Personal Income (Millions of dollars)	Nebraska Personal Income percent change from previous year	Lincoln MSA Personal Income (millions of dollars)	Lincoln MSA Personal Income percent change from previous year
2014	91,845	5.6	13,880,839	4.8
2015	95,455	3.8	14,566,101	4.7
2016	94,731	-0.8	14,998,490	2.9
2017	97,557	2.9	15,556,190	3.6

Source: United States Department of Commerce, Bureau of Economic Analysis, "GDP & Personal Income, Regional Data," https://www.bea.gov/iTable/index_regional.cfm [accessed July 2, 2019]

Table 8. Personal income – all sources: Nebraska/Grand Island MSA comparison

Year	Nebraska Personal Income (Millions of dollars)	Nebraska Personal Income percent change from previous year	Grand Island MSA Personal Income (millions of dollars)	Grand Island MSA Personal Income percent change from previous year
2014	91,845	5.6	3,433,064	2.6
2015	95,455	3.8	3,558,339	3.5
2016	94,731	-0.8	3,541,748	-0.5
2017	97,557	2.9	3,672,840	3.6

Source: United States Department of Commerce, Bureau of Economic Analysis, "GDP & Personal Income, Regional Data," https://www.bea.gov/iTable/index_regional.cfm [accessed July 2, 2019]

The State of Nebraska expects marked changes in GPD and personal income subsequent to the March 2019 flooding and COVID-19 events.

Economic analysis

Existing and emerging demand industry sectors and occupations

INDUSTRY SECTORS

Tables 9 and 10 provide data on Nebraska's 20 industry sectors. Table 9 ranks emerging industry sectors based on projected numeric changes in employment levels, from 2016 to 2026. Based solely on projected numeric changes, the top five emerging industry sectors in Nebraska are:

1. health care and social assistance, with a projected increase of 21,861;
2. professional, scientific, and technical services, with a projected increase of 7,976;
3. accommodation and food services, with a projected increase of 7,660;
4. construction, with projected increase of 7,553; and
5. manufacturing, with a projected increase of 6,729.

Table 10 ranks emerging industry sectors based on percent changes in employment levels, from 2016 to 2026. Based solely on projected percent changes, the top five emerging industry sectors in Nebraska are:

1. professional, scientific, and technical services, with a projected increase of 18.11 percent;
2. health care and social assistance, with a projected increase of 15.61 percent;
3. construction, with a projected increase of 14.94 percent;
4. arts, entertainment, and recreation, with a projected increase of 14.01 percent; and
5. real estate, rental, and leasing, with a projected increase of 10.54 percent.

Table 9. Emerging demand industry sectors based on numeric change in employment levels from 2016 to 2026

Ranking	Industry Title	2016 Annual Employment	2026 Projected Employment	Numeric Change in Employment 2016-2026
--	**Total**	**1,125,138**	**1,225,631**	**100,493**
--	Self-Employed Workers	58,937	65,187	6,250
--	**Total Wage and Salary Employment**	**1,066,201**	**1,160,444**	**94,243**
1	Health Care and Social Assistance	140,001	161,862	21,861
2	Professional, Scientific, and Technical Services	44,053	52,029	7,976
3	Accommodation and Food Services	76,204	83,864	7,660
4	Construction	50,541	58,094	7,553
5	Manufacturing	96,981	103,710	6,729
6	Finance and Insurance	65,046	71,547	6,501
7	Educational Services (including state and local gov)	102,092	108,549	6,457
8	Administrative and Support and Waste Management and Remediation Services	51,054	56,215	5,161
9	Retail Trade	110,044	115,158	5,114
10	Transportation and Warehousing	51,025	55,255	4,230
11	Government	69,468	72,562	3,094
12	Agriculture, Forestry, and Fishing	58,798	61,501	2,703
13	Wholesale Trade	41,506	43,614	2,108
14	Management of Companies and Enterprises	21,365	23,471	2,106
15	Arts, Entertainment, and Recreation	14,111	16,088	1,977
16	Other Services (except Government)	36,904	38,244	1,340
17	Real Estate and Rental and Leasing	9,629	10,644	1,015
18	Information	18,205	18,972	767
19	Mining	981	1,029	48
20	Utilities (private + state + local)	8,193	8,036	-157

Source: Nebraska Department of Labor, NEworks, Labor Market Data, Data Download Center, "Long-term Industry Employment Projections, Nebraska Statewide," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/Nebraska LTOP.xlsx [accessed July 11, 2019]

Table 10. Emerging demand industry sectors based on percent change in employment levels from 2014 to 2024

Ranking	Industry Title	2016 Annual Employment	2026 Projected Employment	Percent Change in Employment 2016-2026
--	**Total**	**1,125,138**	**1,225,631**	**8.93**
--	Self-Employed Workers	58,937	65,187	10.60
--	**Total Wage and Salary Employment**	**1,066,201**	**1,160,444**	**8.84**
1	Professional, Scientific, and Technical Services	44,053	52,029	18.11
2	Health Care and Social Assistance	140,001	161,862	15.61
3	Construction	50,541	58,094	14.94
4	Arts, Entertainment, and Recreation	14,111	16,088	14.01
5	Real Estate and Rental and Leasing	9,629	10,644	10.54
6	Administrative and Support and Waste Management and Remediation Services	51,054	56,215	10.11
7	Accommodation and Food Services	76,204	83,864	10.05
8	Finance and Insurance	65,046	71,547	9.99
9	Management of Companies and Enterprises	21,365	23,471	9.86
10	Transportation and Warehousing	51,025	55,255	8.29
11	Manufacturing	96,981	103,710	6.94
12	Educational Services (including state and local gov)	102,092	108,549	6.32
13	Wholesale Trade	41,506	43,614	5.08
14	Mining	981	1,029	4.89

Ranking	Industry Title	2016 Annual Employment	2026 Projected Employment	Percent Change in Employment 2016-2026
15	Retail Trade	110,044	115,158	4.65
16	Agriculture, Forestry, and Fishing	58,798	61,501	4.60
17	Government	69,468	72,562	4.45
18	Information	18,205	18,972	4.21
19	Other Services (except Government)	36,904	38,244	3.63
20	Utilities (private + state + local)	8,193	8,036	-1.92

Source: Nebraska Department of Labor, NEworks, Labor Market Data, Data Download Center, "Long-term Industry Employment Projections, Nebraska Statewide," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/Nebraska LTOP.xlsx [accessed July 11, 2019]

OCCUPATIONS

Tables 11 and 12 provide data on Nebraska's top 20 emerging demand occupations. Table 11 ranks emerging demand occupations based on projected numeric changes in employment levels, from 2016 to 2026. Based solely on projected numeric changes, the top five emerging demand occupations in Nebraska are:

1. combined food preparation and serving workers, including fast food, with a projected increase of 4,158;
2. registered nurses, with a projected increase of 2,857;
3. heavy and tractor-trailer truck drivers, with a projected increase of 2,535;
4. personal care aides, with a projected increase of 1,994; and
5. nursing assistants, with a projected increase of 1,733.

Table 11. Top 20 emerging demand occupations based on numeric change in employment levels, 2016 - 2026

Ranking	SOC	SOC Title	2016 Estimated Employment	2026 Projected Employment	Numeric Change
1	35-3021	Combined Food Preparation and Serving Workers, Including Fast Food	23,503	27,661	4,158
2	29-1141	Registered Nurses	24,672	27,529	2,857
3	53-3032	Heavy and Tractor-Trailer Truck Drivers	28,994	31,529	2,535
4	39-9021	Personal Care Aides	7,185	9,179	1,994
5	31-1014	Nursing Assistants	14,203	15,936	1,733
6	11-1021	General and Operations Managers	15,362	17,087	1,725
7	39-9011	Childcare Workers	13,889	15,555	1,666
8	37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	15,765	17,401	1,636
9	15-1132	Software Developers, Applications	5,135	6,748	1,613
10	43-4051	Customer Service Representatives	20,881	22,427	1,546
11	47-2031	Carpenters	11,863	13,380	1,517
12	53-7062	Laborers and Freight, Stock, and Material Movers, Hand	15,905	17,401	1,496
13	35-3031	Waiters and Waitresses	15,572	16,964	1,392
14	13-2011	Accountants and Auditors	10,135	11,521	1,386
15	41-2031	Retail Salespersons	30,186	31,463	1,277
16	41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	11,532	12,595	1,063
17	51-3022	Meat, Poultry, and Fish Cutters and Trimmers	10,200	11,252	1,052
18	49-9071	Maintenance and Repair Workers, General	9,316	10,346	1,030
19	43-5081	Stock Clerks and Order Fillers	13,865	14,892	1,027
20	37-2012	Maids and Housekeeping Cleaners	7,838	8,806	968

Source: Nebraska Department of Labor, NEworks, Labor Market Data, Download Center, "High Wage, High Skill, High Demand (H3) Occupations," https://neworks.nebraska.gov/gsipub/index.asp?docid=1165 [accessed July 11, 2019]

Table 12 ranks emerging demand occupations based on percent changes in employment levels, from 2016 to 2026. Based solely on projected percent changes, the top five emerging demand occupations in Nebraska are:

1. wind turbine service technicians, with a projected increase of 90.8 percent;
2. home health aides, with a projected increase of 41.1 percent;
3. information security analysts, with a projected increase of 37.7 percent;
4. occupational therapy assistants, with a projected increase of 33.7 percent; and
5. software developers, with a projected increase of 31.4 percent.

Table 12. Top 20 emerging demand occupations based on percent change in employment levels, 2016 - 2026

Ranking	SOC	SOC Title	2016 Estimated Employment	2026 Projected Employment	Percent Change
1	49-9081	Wind Turbine Service Technicians	120	229	90.8
2	31-1011	Home Health Aides	1,941	2,739	41.1
3	15-1122	Information Security Analysts	681	938	37.7
4	31-2011	Occupational Therapy Assistants	202	270	33.7
5	15-1132	Software Developers, Applications	5,135	6,748	31.4
6	15-2041	Statisticians	220	288	30.9
7	31-2021	Physical Therapist Assistants	709	925	30.5
8	15-2031	Operations Research Analysts	789	1,019	29.2
9	13-2071	Credit Counselors	1,140	1,468	28.8
10	29-1071	Physician Assistants	1,001	1,288	28.7
11	39-9021	Personal Care Aides	7,185	9,179	27.8
12	31-9092	Medical Assistants	3,092	3,934	27.2
13	29-2056	Veterinary Technologists and Technicians	743	943	26.9
14	29-1131	Veterinarians	874	1,095	25.3
15	29-1123	Physical Therapists	1,845	2,311	25.3
16	43-4131	Loan Interviewers and Clerks	1,459	1,824	25.0
17	31-2022	Physical Therapist Aides	557	696	25.0
18	51-9081	Dental Laboratory Technicians	270	337	24.8
19	31-9011	Massage Therapists	588	732	24.5
20	13-1161	Market Research Analysts and Marketing Specialists	3,375	4,195	24.3

Source: Nebraska Department of Labor, NEworks, Labor Market Data, Download Center, "High Wage, High Skill, High Demand (H3) Occupations," https://neworks.nebraska.gov/gsipub/index.asp?docid=1165 [accessed July 11, 2019]

Employers' employment needs

Tables 13 and 14 provide data on education and job-training requirements for emerging demand occupations in Nebraska (refer to Tables 11 and 12). Table 13 identifies education and job training requirements for the top 20 emerging demand occupations based on projected numeric changes in employment levels from 2016 through 2026.

- Seven occupations require no formal educational credential but do require short-term on-the-job training, with entry hourly wages ranging from $9.53 to $12.76 and median hourly wages ranging from $9.80 to $15.08.
- Seven require a high school diploma or its equivalent and short- or moderate-term on-the-job training or apprenticeship training, with entry hourly wages ranging from $9.73 to $15.22 and median hourly wages ranging from $10.37 to $25.26.
- Two require a postsecondary non-degree award and short-term on-the-job training or no job-related training, with entry hourly wages ranging from $11.17 to $15.49 and median hourly wages ranging from $12.80 to $19.84.
- Four require a Bachelor's degree but no job-related training, with entry hourly wages ranging from $20.61 to $30.08 and median wages ranging from $29.26 to $42.85.

Table 13 identifies education and job-training requirements for the top 20 emerging demand occupations based on projected percent changes in employment levels from 2016 through 2026.

- Five require a high school diploma or its equivalent and short- or moderate-term on-the-job training, with entry hourly wages ranging from $10.42 to $14.61 and median hourly wages ranging from $11.74 to $21.65.
- Three require a postsecondary non-degree award and long-term on-the-job training or no job-related training, with entry hourly wages ranging from $12.21 to $12.37 and median hourly wages ranging from $15.30 to $15.42.
- Three require an Associate's degree but no job-related training, with entry hourly wages ranging from $11.58 to $19.69 and median hourly wages ranging from $15.05 to $28.80.
- Five require a Bachelor's degree and moderate-term on-the-job training or no job-related training, with entry hourly wages ranging from $17.85 to $30.08 and median wages ranging from $26.75 to $42.85.
- Two require a Master's degree but no job-related training, with entry hourly wages ranging from $20.28 to $35.70 and median wages ranging from $29.30 to $47.43.
- Two require a Doctoral or professional degree but no job-related training, with entry hourly wages ranging from $25.00 to $25.64 and median wages ranging from $35.01 to $36.98.

Table 13. Education and job training requirements for the top 20 emerging demand occupations (based on numeric change in employment levels, 2016 - 2026)

Ranking	SOC	SOC Title	Education	Job Training	Median Hourly Wage	Entry Wage
1	35-3021	Combined Food Preparation and Serving Workers, Including Fast Food	No formal educational credential	Short-term on-the-job training	$9.96	$9.74
2	29-1141	Registered Nurses	Bachelor's degree	None	$29.26	$23.43
3	53-3032	Heavy and Tractor-Trailer Truck Drivers	Postsecondary non-degree award	Short-term on-the-job training	$19.84	$15.49
4	39-9021	Personal Care Aides	High school diploma or equivalent	Short-term on-the-job training	$11.94	$10.79
5	31-1014	Nursing Assistants	Postsecondary non-degree award	None	$12.80	$11.17
6	11-1021	General and Operations Managers	Bachelor's degree	None	$41.05	$22.95
7	39-9011	Childcare Workers	High school diploma or equivalent	Short-term on-the-job training	$10.37	$9.73
8	37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	No formal educational credential	Short-term on-the-job training	$11.88	$10.23
9	15-1132	Software Developers, Applications	Bachelor's degree	None	$42.85	$30.08
10	43-4051	Customer Service Representatives	High school diploma or equivalent	Short-term on-the-job training	$15.20	$11.55
11	47-2031	Carpenters	High school diploma or equivalent	Apprenticeship	$17.81	$13.06
12	53-7062	Laborers and Freight, Stock, and Material Movers, Hand	No formal educational credential	Short-term on-the-job training	$14.03	$10.64
13	35-3031	Waiters and Waitresses	No formal educational credential	Short-term on-the-job training	$9.80	$9.68
14	13-2011	Accountants and Auditors	Bachelor's degree	None	$29.35	$20.61
15	41-2031	Retail Salespersons	No formal educational credential	Short-term on-the-job training	$11.07	$9.53

Ranking	SOC	SOC Title	Education	Job Training	Median Hourly Wage	Entry Wage
16	41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	High school diploma or equivalent	Moderate-term on-the-job training	$25.26	$15.22
17	51-3022	Meat, Poultry, and Fish Cutters and Trimmers	No formal educational credential	Short-term on-the-job training	$15.08	$12.76
18	49-9071	Maintenance and Repair Workers, General	High school diploma or equivalent	Moderate-term on-the-job training	$18.15	$12.63
19	43-5081	Stock Clerks and Order Fillers	High school diploma or equivalent	Short-term on-the-job training	$11.74	$9.96
20	37-2012	Maids and Housekeeping Cleaners	No formal educational credential	Short-term on-the-job training	$10.35	$9.71

Source: Nebraska Department of Labor, NEworks, Labor Market Data, Download Center, "High Wage, High Skill, High Demand (H3) Occupations," https://neworks.nebraska.gov/gsipub/index.asp?docid=1165 [accessed July 11, 2019]

Table 14. Education and job training requirements for the top 20 emerging demand occupations (based on percent change in employment levels, 2016 - 2026)

Ranking	SOC	SOC Title	Education	Job Training	Median Hourly Wage	Entry Wage
1	49-9081	Wind Turbine Service Technicians	Postsecondary non-degree award	Long-term on-the-job training	NA	NA
2	31-1011	Home Health Aides	High school diploma or equivalent	Short-term on-the-job training	$12.02	$11.03
3	15-1122	Information Security Analysts	Bachelor's degree	None	$35.57	$24.36
4	31-2011	Occupational Therapy Assistants	Associate's degree	None	$28.80	$19.69
5	15-1132	Software Developers, Applications	Bachelor's degree	None	$42.85	$30.08
6	15-2041	Statisticians	Master's degree	None	$29.30	$20.28
7	31-2021	Physical Therapist Assistants	Associate's degree	None	$24.13	$16.82
8	15-2031	Operations Research Analysts	Bachelor's degree	None	$34.67	$23.82
9	13-2071	Credit Counselors	Bachelor's degree	Moderate-term on-the-job training	NA	NA
10	29-1071	Physician Assistants	Master's degree	None	$47.43	$35.70
11	39-9021	Personal Care Aides	High school diploma or equivalent	Short-term on-the-job training	$11.94	$10.79
12	31-9092	Medical Assistants	Postsecondary non-degree award	None	$15.42	$12.37
13	29-2056	Veterinary Technologists and Technicians	Associate's degree	None	$15.05	$11.58
14	29-1131	Veterinarians	Doctoral or professional degree	None	$35.01	$25.00
15	29-1123	Physical Therapists	Doctoral or professional degree	None	$36.98	$25.64
16	43-4131	Loan Interviewers and Clerks	High school diploma or equivalent	Short-term on-the-job training	$18.98	$13.92
17	31-2022	Physical Therapist Aides	High school diploma or equivalent	Short-term on-the-job training	$11.74	$10.42

Ranking	SOC	SOC Title	Education	Job Training	Median Hourly Wage	Entry Wage
18	51-9081	Dental Laboratory Technicians	High school diploma or equivalent	Moderate-term on-the-job training	$21.65	$14.61
19	31-9011	Massage Therapists	Postsecondary non-degree award	None	$15.30	$12.21
20	13-1161	Market Research Analysts and Marketing Specialists	Bachelor's degree	None	$26.75	$17.85

Source: Nebraska Department of Labor, NEworks, Labor Market Data, Download Center, "High Wage, High Skill, High Demand (H3) Occupations," https://neworks.nebraska.gov/gsipub/index.asp?docid=1165 [accessed July 11, 2019]

B. Workforce Analysis

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA[4]. This population must include individuals with disabilities among other groups[5] 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.

i. Employment and Unemployment

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

ii. Labor Market Trends

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

iii. Education and Skill Levels of the Workforce

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

iv. Skill Gaps

Describe apparent 'skill gaps'.

Employment and unemployment

Since 2015, Nebraska has gained 12,939 workers in the civilian labor force, while maintaining a low, relatively stable statewide rate of unemployment, as illustrated in Table 15.

Table 15. Total civilian labor force in Nebraska, 2015 – 2018

Time period	Labor force	Employed	Unemployed	Unemployment rate %
2015	1,007,258	976,997	30,261	3.0
2016	1,009,443	978,533	30,910	3.1
2017	1,011,626	982,442	29,184	2.9
2018	1,020,197	991,688	28,509	2.8

Source: Nebraska Department of Labor, Labor Market Information, Local Area Unemployment Statistics, https://neworks.nebraska.gov/vosnet/analyzer/results.aspx?session=labforce [accessed July 14, 2019]

Percentage unemployment rates for 2018 for each of Nebraska's 93 counties, ranked by county from lowest to highest, are listed in Table 16. County unemployment rates vary from 1.9 percent in Perkins County to 5.0 percent in Arthur County.

Table 16. Unemployment rates by county in Nebraska, 2018

Rank	Area	Unemployment rate %
1	Perkins County	1.9
2	Cherry County	2.1
3	Custer County	2.1
5	Kearney County	2.1
4	Boone County	2.2
6	Chase County	2.2
8	Dundy County	2.2
7	Hayes County	2.2
9	Keya Paha County	2.2
10	Phelps County	2.2
11	Thayer County	2.2
13	Buffalo County	2.3
12	Butler County	2.3
14	Cedar County	2.3
17	Colfax County	2.3
16	Garden County	2.3
18	Harlan County	2.3
15	Polk County	2.3
19	Antelope County	2.4
21	Garfield County	2.4
23	Nance County	2.4
22	Red Willow County	2.4
20	Rock County	2.4
24	Wayne County	2.4
32	Cuming County	2.5
29	Fillmore County	2.5
31	Frontier County	2.5
27	Gosper County	2.5
26	Hamilton County	2.5
25	Jefferson County	2.5
28	Lancaster County	2.5
30	Madison County	2.5
33	McPherson County	2.5
35	Pawnee County	2.5
37	Stanton County	2.5
36	Wheeler County	2.5
34	York County	2.5
38	Furnas County	2.6
39	Grant County	2.6
44	Greeley County	2.6
40	Holt County	2.6
42	Kimball County	2.6
43	Nuckolls County	2.6
47	Pierce County	2.6
41	Platte County	2.6
46	Seward County	2.6
45	Sheridan County	2.6
48	Sherman County	2.6
51	Sioux County	2.6
49	Dawes County	2.7
52	Dodge County	2.7
50	Morrill County	2.7
53	Sarpy County	2.7
56	Saunders County	2.7
57	Box Butte County	2.8

Rank	Area	Unemployment rate %
58	Cheyenne County	2.8
54	Dawson County	2.8
55	Logan County	2.8
59	Merrick County	2.8
65	Otoe County	2.8
66	Washington County	2.8
64	Webster County	2.8
61	Adams County	2.9
62	Valley County	2.9
60	Boyd County	3.0
63	Cass County	3.0
67	Deuel County	3.0
70	Dixon County	3.0
69	Franklin County	3.0
68	Howard County	3.0
71	Keith County	3.0
73	Knox County	3.0
75	Lincoln County	3.0
74	Loup County	3.0
76	Richardson County	3.0
72	Saline County	3.0
77	Thomas County	3.0
78	Clay County	3.1
79	Douglas County	3.1
80	Gage County	3.2
85	Hall County	3.2
81	Scotts Bluff County	3.2
82	Brown County	3.3
86	Burt County	3.3
83	Banner County	3.4
84	Hitchcock County	3.4
87	Nemaha County	3.4
88	Dakota County	3.5
89	Johnson County	3.6
90	Hooker County	3.7
91	Thurston County	4.0
92	Blaine County	4.6
93	Arthur County	5.0

Source: Nebraska Department of Labor, Labor Market Information, Local Area Unemployment Statistics, https://neworks.nebraska.gov/vosnet/analyzer/results.aspx?session=labforce [accessed July 11, 2019)

The two largest counties in Nebraska, Douglas, and Lancaster, reported employment gains from December 2015 to December 2016.[1]

- Employment rose 0.5 percent in Lancaster County and 0.3 percent in Douglas County. (Refer to Table 17.)
- Between the two largest counties in Nebraska, employment was higher in Douglas (342,800) in December 2018. (Refer to Table 17.)
- Lancaster County recorded an employment level of 172,400. (Refer to Table 17.)
- Collectively, Nebraska's two large counties accounted for 47.0 percent of the state's employment. (Refer to Table 17.)
- The average weekly wage in Douglas was $1,039 in the fourth quarter of 2018, an increase of 3.0 percent from the fourth quarter of 2017. (Refer to Table 18.)
- Average weekly wages in Lancaster were $904, up 2.6 percent over the year. (Refer to Table 18.)

Employment and wage levels (but not over-the-year changes) are also available for the 93 counties in Nebraska with employment levels below 75,000. (Refer to Table 18.) Two of these smaller counties, Washington and Stanton, had average weekly wages above the national average of $1,144.

Table 17. Covered employment and wages in the United States and the 2 largest counties in Nebraska, fourth quarter 2018

Area	Employment - December 2018 (thousands)	Employment - Percent change, December 2015-16 (1)	Employment - National ranking by percent change (2)	Average weekly wage (3)	Average weekly wage - National ranking by level (2)	Average weekly wage - Percent change, fourth quarter 2017-18 (1)	Average weekly wage - National ranking by percent change (2)
United States (4)	148,061.8	1.5	--	1,144	--	3.2	--
Nebraska	983.0	0.2	--	930	40	3.2	30
Douglas	342.8	0.3	258	1,039	167	3.0	176
Lancaster	172.4	0.5	242	904	291	2.6	210

Table footnotes:
(1) Percent changes were computed from quarterly employment and pay data adjusted for noneconomic county reclassifications
(3) Ranking does not include data for Puerto Rico or the Virgin Islands
(3) Average weekly wages were calculated using unrounded data
(4) Totals for the United States do not include data for Puerto Rico or the Virgin Islands
Note: Data are preliminary. Covered employment and wages include workers covered by Unemployment Insurance (UI) and Unemployment Compensation for Federal Employees (UCFE) programs.
Source: United States Department of Labor, Bureau of Labor Statistics, County Employment and Wages in Nebraska - Fourth Quarter 2018, https://www.bls.gov/regions/midwest/news-release/countyemploymentandwages_nebraska.htm [accessed July 14, 2019]

Table 18. Covered employment and wages in the United States and all counties in Nebraska, fourth quarter 2018

Area	Employment December 2018	Average weekly wage(1)
United States(2)	148,061,773	1,144
Nebraska	982,981	930
Adams	15,074	812
Antelope	2,091	758
Arthur	86	573
Banner	111	757
Blaine	131	673
Boone	2,424	780
Box Butte	3,768	726
Boyd	574	594
Brown	1,222	733
Buffalo	27,432	798
Burt	1,764	751
Butler	2,581	778
Cass	5,774	763
Cedar	2,654	749
Chase	1,950	781
Cherry	2,239	619
Cheyenne	4,365	824
Clay	2,321	909
Colfax	5,168	893
Cuming	3,651	846
Custer	4,511	778
Dakota	12,652	945
Dawes	3,041	659
Dawson	11,525	808
Deuel	513	642
Dixon	1,653	781
Dodge	17,338	823
Douglas	342,763	1,039
Dundy	566	786
Fillmore	2,194	826

Area	Employment December 2018	Average weekly wage(1)
Franklin	720	724
Frontier	863	687
Furnas	1,978	744
Gage	8,973	747
Garden	543	636
Garfield	830	672
Gosper	378	798
Grant	292	664
Greeley	620	679
Hall	34,756	813
Hamilton	3,618	908
Harlan	820	663
Hayes	208	631
Hitchcock	660	720
Holt	4,490	747
Hooker	279	518
Howard	1,590	697
Jefferson	3,389	702
Johnson	1,547	767
Kearney	2,242	791
Keith	3,163	710
Keya Paha	149	568
Kimball	1,446	743
Knox	2,915	685
Lancaster	172,364	904
Lincoln	14,366	790
Logan	190	625
Loup	122	479
Madison	22,026	844
McPherson	72	636
Merrick	2,313	838
Morrill	1,521	770
Nance	1,003	710
Nemaha	2,919	1,061
Nuckolls	1,489	692
Otoe	6,056	777
Pawnee	744	753
Perkins	1,154	885
Phelps	4,695	897
Pierce	1,953	784
Platte	19,179	892
Polk	1,471	753
Red Willow	5,072	731
Richardson	2,593	692
Rock	491	711
Saline	7,126	847
Sarpy	73,215	933
Saunders	5,349	752
Scotts Bluff	16,450	799
Seward	6,027	873
Sheridan	1,755	663
Sherman	809	613
Sioux	156	693
Stanton	1,354	1,330
Thayer	2,362	791
Thomas	257	636

Area	Employment December 2018	Average weekly wage(1)
Thurston	2,975	905
Valley	1,770	741
Washington	7,802	1,168
Wayne	4,261	725
Webster	1,031	654
Wheeler	313	752

Table footnotes
(1) Average weekly wages were calculated using unrounded data.
(2) Totals for the United States do not include data for Puerto Rico or the Virgin Islands.
NOTE: Includes workers covered by Unemployment Insurance (UI) and Unemployment Compensation for Federal Employees (UCFE) programs. Data are preliminary.
Source: United States Department of Labor, Bureau of Labor Statistics, County Employment and Wages in Nebraska - Fourth Quarter 2018, https://www.bls.gov/regions/midwest/news-release/countyemploymentandwages_nebraska.htm [accessed July 14, 2019]

[1] Large counties are defined as those with employment of 75,000 or more as measured by 2017 annual average employment. (United States Department of Labor, Bureau of Labor Statistics, County Employment and Wages in Nebraska – Fourth Quarter 2018, https://www.bls.gov/regions/midwest/news-release/countyemploymentandwages_nebraska.htm [accessed July 14, 2019])

Labor availability[1]

In 2015, NDOL and the Nebraska Department of Economic Development (NDED), with support from the University of Nebraska - Lincoln, Bureau of Sociological Research (BOSR) began a new series of studies to measure labor availability in these Nebraska regions:

- Central Nebraska;
- Lincoln Metro;
- Omaha Metro;
- Northeast Nebraska;
- Panhandle area of Nebraska (Scottsbluff);
- Southeast Nebraska;
- Southwest Nebraska;
- Sandhills area of Nebraska (Valentine); and
- Niobrara River area of Nebraska (O'Neill).

Central Nebraska

Results of the Central Nebraska Labor Availability Survey, which included all or parts of Hall, Hamilton, Howard, and Merrick counties, among others, revealed that there were an estimated 11,698 potential job seekers, over the age of 18, in the city of Grand Island during the fall of 2016. The majority of these potential job seekers were currently employed (85.9 percent). Others were out of work or seeking to reenter the workforce after time spent in retirement or homemaking. These potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presented itself. The median minimum pay that potential job seekers required to improve their employment situation was $60,000 annually for employees who typically work as salaried employees or $18 per hour for employees who are typically compensated at an hourly rate (calculated separately). The median tenure of employed potential job seekers at their current job was 45 months, or just under four years. Over 36 percent of potential job seekers reported they held a bachelor's degree or higher. Potential job seekers identified salary, health insurance, and a work schedule that would fit their needs as the most important factors in improving their employment situation. Potential job seekers named lack of job opportunities in the area, inadequate pay offered at area employers, and inadequate benefits offered by area employers as the most common barriers to improving their employment situation.

Lincoln metro region

Results of the Lincoln Metro Labor Availability Survey, which covered all or parts of 12 counties including Gage, Lancaster and Seward counties, revealed that there were an estimated 106,034 potential job seekers, age 18 and over, in the survey area during the winter of 2018. The majority of potential job seekers in the survey area were currently

employed (88.3 percent). Others were out of work or seeking to reenter the workforce after time spent in retirement or homemaking.

Potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presented itself. The median minimum pay that potential job seekers required to improve their employment situation was $55,100 annually for employees who typically work as salaried employees or $17.31 per hour for employees who are typically compensated at an hourly rate (calculated separately). The median tenure of employed potential job seekers at their current job was five years. Nearly 57 percent of potential job seekers reported they held a bachelor's or 4-year degree. Potential job seekers indicated salary, health insurance, and retirement benefits as the most important factors in improving their employment situation. Potential job seekers indicated inadequate pay offered at area employers, lack of job opportunities in the area and inadequate benefits offered by area employers as the most common obstacles to improving their employment situation.

Active job seekers are a subset of potential job seekers who reported they were actively seeking a new job. An estimated 29,622 active job seekers, age 18 and over, were seeking employment in the survey area at the time of the study. The median minimum pay that active job seekers required to improve their employment situation was $15.80 per hour for employees who are typically compensated at an hourly rate and $65,000 annually for employees who typically work as salaried employees. Most active job seekers were employed (83.8 percent) and the median job tenure of active seekers was three years and six months. Over 57 percent of active seekers held a bachelor's degree and their most important factors when choosing a new job were salary, health insurance, and using skills they have. The most common obstacles to active job seekers were the same as those reported by potential job seekers: inadequate pay offered lack of job opportunities in the area and inadequate benefits offered by area employers.

Omaha metro region

Results of the Omaha Metro Labor Availability Survey, which included all or parts of seven counties in the Omaha Metro region of Nebraska, and three counties in western Iowa, revealed that there were an estimated 239,623 potential job seekers, age 18 and over, in the survey area during the fall of 2017. The majority of potential job seekers in the survey area were currently employed (86.6 percent). Others were out of work or seeking to reenter the workforce after time spent in retirement or homemaking.

Potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presented itself. The median minimum pay that potential job seekers required to improve their employment situation was $60,000 annually for employees who typically work as salaried employees or $17 per hour for employees who are typically compensated at an hourly rate (calculated separately). The median tenure of employed potential job seekers at their current job was 53 months, or over four years. More than half of potential job seekers (56 percent) reported they held at least bachelor's or 4-year degree, and 27.4 percent held graduate or professional degrees. Potential job seekers indicated salary, work schedule that fits their needs and health insurance as the most important factors in improving their employment situation. Potential job seekers indicated inadequate pay offered by area employers, lack of job opportunities in the area, and inadequate benefits offered by area employers as the most common obstacles to improving their employment situation.

Active job seekers are a subset of potential job seekers who reported they were actively seeking a new job. An estimated 75,269 active job seekers, 18 and over, were seeking employment in the survey area at the time of the survey. The median minimum pay that active job seekers required to improve their employment situation was $16 for employees who are typically compensated at an hourly rate and $58,500 annually for employees who typically work as salaried employees. Most active job seekers were employed (82.6 percent) and the median job tenure of active seekers was just over three years (37 months). Over 55 percent of active seekers held at least a bachelor's degree and their most important factors when choosing a new job were salary, a work schedule that fits their needs, and paid vacation. The most common obstacles to active job seekers were the same as those reported by potential job seekers: lack of job opportunities in the area, inadequate pay offered, and inadequate benefits offered by area employers.

Northeast Nebraska

Results of the Northeast Nebraska Labor Availability Survey, which included all or parts of 17 counties in the northeast region of Nebraska, including Madison, Platte, and Dodge counties, revealed that there were an estimated 37,051 potential job seekers, age 18 and over, in the survey area during the fall of 2017. The majority of potential job seekers in the survey area were currently employed (88.7 percent). Others were out of work or seeking to reenter the workforce after time spent in retirement or homemaking.

Potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presented itself. The median minimum pay that potential job seekers required to improve their employment situation was $52,750 annually for employees who typically work as salaried employees or $15 per hour for employees who are typically compensated at an hourly rate (calculated separately). The median tenure of employed potential job seekers at their current job was 62 months, or just over five years. More than 35 percent of potential job seekers reported they held a bachelor's or 4-year degree. Potential job seekers indicated salary, health insurance, and a work schedule that fits their needs as the most important factors in improving their employment situation. Potential job seekers indicated lack of job opportunities in the area, inadequate pay offered at area employers, and inadequate benefits offered by area employers as the most common obstacles to improving their employment situation. Active job seekers are a subset of potential job seekers who reported they were actively seeking a new job. An estimated 9,435 active job seekers, 18 and over, were seeking employment in the survey area at the time of the study. The median minimum pay that active job seekers required to improve their employment situation was $15 per hour for employees who are typically compensated at an hourly rate and $50,000 annually for employees who typically work as salaried employees. Most active job seekers were employed (84.4 percent) and the median job tenure of active seekers was nearly four years (47 months). Over 32 percent of active seekers held a bachelor's degree and their most important factors when choosing a new job were salary, health insurance, and a work schedule that fits their needs. The most common obstacles to active job seekers were the same as those reported by potential job seekers: lack of job opportunities in the area, inadequate pay offered, and inadequate benefits offered by area employers.

Panhandle area of Nebraska (Scottsbluff)

Results of the Panhandle Labor Availability Survey, which included areas in western Nebraska such as Scottsbluff, Alliance, and Sidney, as well as Goshen County, Wyoming, revealed that there were an estimated 23,543 potential job seekers in the Panhandle survey area during the summer of 2015. The majority of these potential job seekers are currently employed (81.4 percent). Others are out of work or seeking to reenter the workforce after time spent in retirement or homemaking. These potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presents itself. The median wage sought by this group was a minimum of $40,000 annually for employees who typically work as salaried employees or $19.23 per hour for full-time, year-round work for employees who are typically compensated at an hourly rate (calculated separately). Nearly all (93 percent) potential job seekers stated that they were willing to commute 15 minutes or more each way for suitable work. The median tenure of employed potential job seekers at their current job was four and one-half years. Over a third of potential job seekers (36.4 percent) said they had at least a bachelor's degree. Potential job seekers identified salary, work schedule, and using skills they have as the most important factors in improving their employment situation. They named lack of job opportunities in the area, inadequate pay offered at area employers, and inadequate benefits offered by area employers as the most common barriers to improving their employment situation.

Southeast Nebraska

Results of the Southeast Nebraska Labor Availability Survey, which included all or parts of eight counties in the southeast region of Nebraska and southwest Iowa, including Johnson, Nemaha, Pawnee, Otoe, and Richardson counties in Nebraska, revealed that there were an estimated 11,403 potential job seekers, over the age of 18, in the survey area during the fall of 2016 (29 percent of all potential respondents). The majority of potential job seekers in the survey area were currently employed (80 percent). Others were out of work or seeking to reenter the workforce after time spent in retirement or homemaking. These potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presented itself. The median minimum pay that potential job seekers required to improve their employment situation was $55,000 annually for employees who typically work as salaried employees or $16 per hour for employees who are typically compensated at an hourly rate (calculated separately). The median tenure of employed potential job seekers at their current job was 85 months, or just over seven years. Over 37 percent of potential job seekers reported they held a bachelor's degree or higher. Potential job seekers indicated salary, a work schedule that would fit their needs and health insurance as the most important factors in improving their employment situation. Potential job seekers indicated lack of job opportunities in the area, inadequate pay offered at area employers, and inadequate benefits offered by area employers as the most common obstacles to improving their employment situation.

Southwest Nebraska

Results of the Southwest Nebraska Labor Availability Survey, which included all or parts of 11 counties in southwest Nebraska, including Chase, Dundy, Frontier, Hayes, Hitchcock, Keith, Lincoln, Logan, Perkins, and Red Willow. The survey revealed that there were an estimated 5,007 potential job seekers, over the age of 18, in the city of North Platte

during the fall of 2016. The majority of these potential job seekers were currently employed (82.8 percent). Others were out of work or seeking to reenter the workforce after time spent in retirement or homemaking. These potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presented itself. The median minimum pay that potential job seekers required to improve their employment situation was $50,000 annually for employees who typically work as salaried employees or $15 per hour for employees who are typically compensated at an hourly rate (calculated separately). The median tenure of employed potential job seekers at their current job was 43 months, or just over three and one-half years. Over 28 percent of potential job seekers reported they held a bachelor's degree or higher. Potential job seekers identified salary, health insurance, and a work schedule that would fit their needs as the most important factors in improving their employment situation. Potential job seekers indicated a lack of job opportunities in the area, inadequate pay offered at area employers, and inadequate benefits offered by area employers as the most common obstacles to improving their employment situation.

Sandhills area of Nebraska

Results of the Valentine Labor Availability Survey, which included Cherry County and all or parts of nine other counties in the Valentine region of Nebraska and South Dakota, revealed that there were an estimated 6,328 potential job seekers, age 18 and over, in the survey area during the fall of 2018. The majority of potential job seekers in the survey area were currently employed (87.3 percent). Others were out of work or seeking to reenter the workforce after time spent in retirement or homemaking.

Potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presented itself. The median minimum pay that potential job seekers required to improve their employment situation was $50,000 annually for employees who typically work as salaried employees or $16.25 per hour for employees who are typically compensated at an hourly rate (calculated separately). The median tenure of employed potential job seekers at their current job was seven years and four months. More than 37 percent of potential job seekers reported they held a bachelor's or 4-year degree. Potential job seekers indicated dental insurance, salary, and paid vacation as the most important factors in improving their employment situation. Potential job seekers indicated lack of job opportunities in the area, inadequate pay offered at area employers, and inadequate benefits offered by area employers as the most common obstacles to improving their employment situation.

Active job seekers are a subset of potential job seekers who reported they were actively seeking a new job. An estimated 1,250 active job seekers, 18 and over, were seeking employment in the survey area at the time of the study. The median minimum pay that active job seekers required to improve their employment situation was $15 for employees who are typically compensated at an hourly rate and $47,500 annually for employees who typically work as salaried employees. Most active job seekers were employed (79 percent) and the median job tenure of active seekers was four years and eight months. Over 37 percent of active seekers held a bachelor's degree, and active job seekers' most important factors when choosing a new job were health insurance, opportunity for advancement, and salary. The most common obstacles to active job seekers were the same as those reported by potential job seekers: lack of job opportunities in the area, inadequate benefits offered by area employers, and inadequate pay offered.

Niobrara River area of Nebraska

Results of the O'Neill Labor Availability Survey, which included Holt County and all or parts of 11 other counties in the Niobrara region of Nebraska revealed that there were an estimated 8,567 potential job seekers, age 18 and over, in the survey area during the fall of 2018. The majority of potential job seekers in the survey area were currently employed (83.8 percent). Others were out of work or seeking to reenter the workforce after time spent in retirement or homemaking.

Potential job seekers indicated that they were willing to take new work or change jobs in the next year if a suitable job presented itself. The median minimum pay that potential job seekers required to improve their employment situation was $50,000 annually for employees who typically work as salaried employees or $16 per hour for employees who are typically compensated at an hourly rate (calculated separately). The median tenure of employed potential job seekers at their current job was five years and six months. More than 32 percent of potential job seekers reported they held a bachelor's or 4-year degree. Potential job seekers indicated salary, health insurance, and retirement benefits as the most important factors in improving their employment situation. Potential job seekers indicated lack of job opportunities in the area, inadequate pay offered at area employers, and inadequate benefits offered by area employers as the most common obstacles to improving their employment situation.

Active job seekers are a subset of potential job seekers who reported they were actively seeking a new job. An estimated 1,982 active job seekers, 18 and over, were seeking employment in the survey area at the time of the study. The median

minimum pay that active job seekers required to improve their employment situation was $16 per hour for employees who are typically compensated at an hourly rate and $57,000 annually for employees who typically work as salaried employees. Most active job seekers were employed (79.4 percent) and the median job tenure of active seekers was four years and four months. Over 35 percent of active seekers held a bachelor's degree and active job seekers' most important factors when choosing a new job were salary, health insurance, and company values. The most common obstacles to active job seekers were the same as those reported by potential job seekers: lack of job opportunities in the area, inadequate pay offered, and inadequate benefits at area employers.

[1] Nebraska Department of Labor, NEworks, Office of Labor Market Information, Publications, Nebraska Labor Availability Studies, https://neworks.nebraska.gov/gsipub/index.asp?docid=802 [accessed July 12, 2019]

Veterans

According to 2018 American Community Survey 1-year Estimates, Veterans make up 8.1 percent of Nebraska's overall population. While Nebraska's Veteran population is statistically similar to the civilian population in relation to educational attainment and employment status, Table 19 shows that there are notable differences between the two populations.

- 90.6 percent of Veterans were male compared to 49.2 percent of civilians.
- 7.70 percent of Veterans were age 18 to 34 compared to 30.5 percent of civilians.
- 25.0 percent of Veterans were age 35 to 54 compared to 31.9 percent of civilians.
- 26.10 percent of Veterans were age 65 to 74 compared to 11.9 percent of civilians.
- 23.3 percent of Veterans were age 75 and older compared to 9.1 percent of civilians.
- 4 percent of Veterans were Hispanic or Latino compared to 9.0 percent of civilians.
- Median income for Veterans was $44,167 compared to $32,259 for civilians.
- 5.4 percent of Veterans had income below poverty level compared to 10.4 percent of civilians.
- 28.6 percent of Veterans were disabled compared to 14.6 of civilians.

Table 19. Veteran status[1]

Data element	Total estimate	Percent estimate	Veterans estimate	Percent Veterans estimate
Civilian population 18 years and over	1,448,974	NA	116,754	8.10%
PERIOD OF SERVICE	-	-	-	-
Gulf War (9/2001 or later) veterans	NA	NA	24,870	21.30%
Gulf War (8/1990 to 8/2001) veterans	NA	NA	28,014	24.00%
Vietnam era veterans	NA	NA	40,072	34.30%
Korean War veterans	NA	NA	10,144	8.70%
World War II veterans	NA	NA	3,231	2.80%
SEX	-	-	-	-
Male	713,372	49.20%	105,810	90.60%
Female	735,602	50.80%	10,944	9.40%
AGE	-	-	-	-
18 to 34 years	441,323	30.50%	8,954	7.70%
35 to 54 years	461,828	31.90%	29,182	25.00%
55 to 64 years	241,825	16.70%	20,979	18.00%
65 to 74 years	172,853	11.90%	30,416	26.10%
75 years and over	131,145	9.10%	27,223	23.30%
RACE AND HISPANIC OR LATINO ORIGIN	-	-	-	-
White alone	1,276,396	88.10%	107,884	92.40%
Black or African American alone	64,761	4.50%	5,102	4.40%
American Indian and Alaska Native alone	11,843	0.80%	766	0.70%
Asian alone	35,409	2.40%	921	0.80%
Native Hawaiian and Other Pacific Islander alone	N	N	N	N
Some other race alone	31,141	2.10%	757	0.60%
Two or more races	28,443	2.00%	1,311	1.10%
Hispanic or Latino (of any race)	130,370	9.00%	4,718	4.00%
White alone, not Hispanic or Latino	1,184,199	81.70%	104,266	89.30%

Data element	Total estimate	Percent estimate	Veterans estimate	Percent Veterans estimate
MEDIAN INCOME IN THE PAST 12 MONTHS (in 2018 inflation-adjusted dollars)	-	-	-	-
Civilian population 18 years and over with income	32,259	NA	44,167	NA
Male	NA	NA	44,403	NA
Female	NA	NA	41,553	NA
EDUCATIONAL ATTAINMENT	-	-	-	-
Civilian population 25 years and over	1,262,246	NA	115,097	NA
Less than high school graduate	108,346	8.60%	7,844	6.80%
High school graduate (includes equivalency)	326,274	25.80%	31,799	27.60%
Some college or associate's degree	419,337	33.20%	41,271	35.90%
Bachelor's degree or higher	408,289	32.30%	34,183	29.70%
EMPLOYMENT STATUS	-	-	-	-
Civilian population 18 to 64 years	1,144,976	NA	59,115	NA
Labor force participation rate	NA	82.50%	NA	84.70%
Civilian labor force 18 to 64 years	944,524	NA	50,042	NA
Unemployment rate	NA	3.40%	NA	2.70%
POVERTY STATUS IN THE PAST 12 MONTHS	-	-	-	-
Civilian population 18 years and over for whom poverty status is determined	1,404,595	NA	114,309	NA
Income in the past 12 months below poverty level	146,028	10.40%	6,191	5.40%
Income in the past 12 months at or above poverty level	1,258,567	89.60%	108,118	94.60%
DISABILITY STATUS	-	-	-	-
Civilian population 18 years and over for whom poverty status is determined	1,404,595	NA	114,309	NA
With any disability	204,501	14.60%	32,676	28.60%
Without a disability	1,200,094	85.40%	81,633	71.40%

Note: In the table, "NA" means not applicable and "N" means data cannot be displayed because the number of sample cases is too small.

Low-income individuals and individuals in poverty

Tables 20, 21, and 22 provide statistics on Federal program participation, poverty by demographic, and economic well-being in Nebraska.

Table 20. Federal program participation

Program	Number of individuals
Adults and children receiving welfare (TANF)	10,679
Children receiving food stamps (SNAP)	85,000
EITC (earned income tax credit) recipients	129,000
Families receiving child care subsidies	5,500
Households receiving federal rental assistance	27,000
Households receiving LIHEAP (Low Income Home Energy Assistance Program)	43,689
Number of children enrolled in Medicaid and CHIP	163,545
Number of women and children receiving WIC (Women, Infants and Children supplemental nutrition program)	37,440
Participants in all Head Start programs	5,159

Table 21. Poverty by demographic

Category	Amount
Child poverty rate	13.90%
Number of Hispanic children below 200% poverty	51,000
Percent of single-parent families with related children that are below poverty	28%
Senior poverty rate	7.20%
Women in poverty	12.00%

Table 22. Economic well-being

Condition	Amount
Extreme poverty rate	6.00%
Food insecurity	11.90%
Minimum Wage	$9.00
Number of Hispanic children living in families where no parent has full-time, year-round employment	24,000
Percent of individuals who are uninsured	8.30%
Percent of jobs that are low-wage	22.20%
Percent of working families under 200% of the poverty line	29.20%
Poverty rate	10.80%

[1] United States Census Bureau, "VETERAN STATUS 2018 American Community Survey 1-year Estimates," https://data.census.gov/cedsci/table?q=nebraska%20veterans&g=0400000US31&tid=ACSST1Y2018.S2101&t=Veterans [accessed June 2, 2020]

Underutilization[1]

In 2018, the broadest measure of labor underutilization, which includes the unemployed, workers employed part time for economic reasons, and those marginally attached to the labor force), was 5.8 percent in Nebraska, significantly lower than the 7.7 percent rate for the nation. The six alternative measures of labor underutilization in Nebraska in 2018 were not statistically different from the rates recorded in 2017. Nationally, all six measures declined significantly over the year.

The official concept of unemployment includes all jobless persons who are available to take a job and have actively sought work during the four weeks preceding the data collection for the Current Population Survey (CPS).[2] In Nebraska, 2.8 percent of the labor force was unemployed, significantly lower than the 3.9 percent rate for the nation.

Nebraska had 29,300 unemployed residents in 2018 according to the CPS. In addition, 22,300 workers were employed part-time for economic reasons (also known as involuntary part-time). These individuals were working part time because of slack work or business conditions, or because they were unable to find a full-time job. Nationwide, there were 4.8 million individuals working part time for economic reasons in 2018.

In 2018, the number of individuals considered marginally attached to the labor force in Nebraska was 8,700. People marginally attached to the labor force are not working but indicate that they would like to work, are available to work, and have looked for work at some time during the past 12 months even though they had not searched for work in the 4 weeks preceding the survey. In the United States, the number marginally attached totaled 1.5 million in 2018.

Discouraged workers, a subset of the marginally attached, are persons who are not currently looking for work because they believe no jobs are available for them. In 2018, there were 1,800 discouraged workers in Nebraska, accounting for about 21 percent of all marginally attached workers in the state. The combined 2016 unemployment rate for unemployed workers and discouraged-workers was 3.0 percent in Nebraska in 2018, significantly lower than the national rate of 4.1 percent.

Individuals with disabilities[3]

Nebraska is more successful at utilization of individuals with disabilities in its workforce compared to national averages. In 2019, a national organization that promotes meaningful employment, fair wages, and career advancement for people with disabilities recognized the Department of Health and Human Services (NDHHS) for efforts in Nebraska to move toward competitive integrated employment, a vision that all people have a right to be employed in the general workforce. The Association of People Supporting Employment (APSE) champions moving individuals with disabilities out of sheltered workshops and into the competitive workplace.

In 2016, Nebraska had 18 service providers who were allowed, by Federal law, to pay sub-minimum wages to some disabled workers. At that time, more than 2,100 Nebraskans with disabilities worked for less wages than their peers without disabilities. The most recent numbers, from 2018, indicate there are now only nine such service provider employers in the state and only 550 people with disabilities who are working for less than minimum wage. Additionally, APSE says in its report that 37 percent of Nebraskans with a cognitive disability, those served by the NDHHS Division of Developmental Disabilities, are currently employed, compared to the national average of just 25 percent. Nebraska is also significantly ahead of the national average for employment for people with any disability,

at 48 percent, compared to the national average of just 34 percent. As of May 2019, more than 112,000 Nebraskans with disabilities, ages 18 to 64, were employed.

Individuals with intellectual and or developmental disabilities in Nebraska's workforce receive coordinated employment services through Vocational Rehabilitation, a partnership between the Nebraska VR Program, a division of the Nebraska Department of Education; the Nebraska Commission for the Blind and Visually Impaired; and NDHHS. The partnership works toward competitive integrated employment that includes pay at or above minimum wage that is not less than what others without a disability are receiving for the same type of job at a location where the employee interacts with other employees without disabilities in comparable positions and has opportunities for advancement, when appropriate. The partnership also provides career counseling, employment information, and referrals for individuals with disabilities who want to work.

[1] United States Department of Labor, Bureau of Labor Statistics, Alternative Measures of Labor Underutilization, Nebraska – 2018, https://www.bls.gov/regions/midwest/news-release/laborunderutilization_nebraska.htm [accessed July 15, 2019]
[2] The official measure of unemployment in states is derived using a statistical model that incorporates data from the CPS and other sources, and this model-based estimate can differ from the direct CPS estimate discussed here.
[3] Nebraska Department of Health and Human Services, May 14, 2019, "Individuals with Disabilities in Nebraska are going to Work" [Press Release] http://dhhs.ne.gov/Pages/Individuals-With-Disabilities-in-Nebraska-Are-Going-to-Work.aspx [accessed March 20, 2020]. An APSE handout relating to this press release is accessible at https://apse.org/wp-content/uploads/2019/03/NE-CIE-Handout.pdf.

Labor market trends[1]

Industry Projections

NDOL calculates industry employment projections using historical employment data and current economic indicators. Statewide, employment in all industries is projected to increase by 8.8 percent from 2016 to 2026. The projected compound annual growth rate or year-over-year growth rate for all Nebraska industries is 0.9 percent. Statewide, the health care and social assistance industry is projected to add the most jobs by 2026 (approximately 21,900 or 15.6 percent). Professional, scientific, and technical services is projected to see the highest percentage of employment growth at 18.1 percent, representing an increase of 8,000 jobs. Construction is also projected to see a 14.9 percent increase in jobs by 2026, and 14.0 percent growth is expected in arts, entertainment, and recreation. The only Nebraska industry expected to experience decreasing employment through 2026 is utilities (private, state, and local), with a projected loss of 157 jobs, or -1.9 percent. (Refer to Tables 9 and 10 in Section II.a.1.A for additional information on industry trends.)

Occupational projections

NDOL calculates occupational projections by combining industry projections with staffing patterns from the Bureau of Labor Statistics' Occupational Employment Statistics program. This combination reveals the occupational employment ratios within industries and forms the basis for occupational projections. Statewide occupational employment is projected to increase by 8.9 percent from 2016 to 2026. The occupational groups projected to have the largest employment growth by percentage are healthcare support occupations (17.3 percent), computer and mathematical occupations (15.5 percent), and personal care and service occupations (14.8 percent). Food preparation and serving related occupations are projected to see the largest numeric change, adding 9,129 jobs (10.8 percent). No occupational groups are projected to decrease in employment from 2016-2026. (Refer to Tables 11 and 12 in Section II.a.1.A for additional information on occupational trends.)

Job growth by region

Table 23 shows projected employment growth by economic region from 2016 to 2026. The data also gives estimates of the number of job openings due to new job creation (jobs due to growth), and the number of job openings due to workers leaving their positions (jobs due to labor force exits and occupational transfers). The statewide projected job-growth rate of 8.9 percent is slightly higher than the national projected growth rate of 7.4 percent. The Omaha Consortium (Cass, Dodge, Sarpy, Saunders, and Washington Counties) and the state MSAs (Lincoln and Grand Island) are expected to grow at a much faster rate than the rest of the state. Jobs in the Omaha Consortium and the state MSAs are projected to increase by 7.8 to 11.7 percent, compared to around 2 to 6.6 percent in almost all other economic regions. The Omaha Consortium has the high projected job growth in the state at 11.7 percent, and the Panhandle economic region has the lowest at 2 percent.

Table 23. Job growth by region, 2016 - 2026

Region	Job Growth %	Labor Force Exits	Occupational Transfers	Growth Openings
Omaha Consortium	11.7%	233,334	320,715	57,241
Lincoln MSA	11.3%	96,052	131,510	22,702
Grand Island MSA	7.8%	23,798	33,410	3,803
Central	5.9%	37,818	52,385	4,586
Mid Plains	4.3%	26,214	36,998	2,358
Northeast	6.6%	62,733	88,994	8,683
Panhandle	2.0%	21,786	30,328	929
Sandhills	2.9%	7,238	10,644	450
Southeast	4.6%	27,800	39,349	2,672

Source: Nebraska Department of Labor, NEworks, Office of Labor Market Information, Publications, "Nebraska Economic Insight and Outlook," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/Nebraska%20Economic%20Insight%20Outlook2018.pdf [accessed July 11, 2019]

[1] Nebraska Department of Labor, NEworks, Office of Labor Market Information, Publications, "Nebraska Economic Insight and Outlook," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/Nebraska%20Economic%20Insight%20Outlook2018.pdf [accessed July 11, 2019]

Education and skill levels of the workforce

Educational attainment

As described in Table 24, Nebraskans are generally well educated, with 91.3 percent of Nebraskans ages 25 and older possessing, at minimum, a high school diploma or GED, and 65.0 percent of Nebraskans possess at least some postsecondary education. In addition, Nebraskans are better educated than United States residents are in general. While, United States residents, as a whole, are 1.5 percent more likely than Nebraskans to report having a graduate or professional degree, Nebraskans are 5.7 percent more likely to report having all other forms of postsecondary education.

Table 24. Educational attainment in Nebraska compared to US, 2017

Population group and educational attainment level	US estimated number	US estimated %	Nebraska estimated number	Nebraska estimated %	Nebraska compared to US %
Population 18 to 24 years	30,820,412	100.0	186,225	100.0	0.0
Less than high school graduate	3,919,137	12.7	18,896	10.1	-2.6
High school graduate (includes equivalency)	9,772,204	31.7	54,651	29.3	-2.4
Some college or associate's degree	13,755,643	44.6	91,888	49.3	4.7
Bachelor's degree or higher	3,373,428	10.9	20,790	11.2	-0.2
Population 25 years and over	221,250,083	100.0	1,259,254	100.0	0.0
Less than 9th grade	11,267,058	5.1	48,755	3.9	-1.2
9th to 12th grade, no diploma	15,315,153	6.9	60,668	4.8	2.1
High school graduate (includes equivalency)	60,031,545	27.1	331,081	26.3	-0.8
Some college, no degree	45,109,653	20.4	291,423	23.1	2.8
Associate's degree	18,760,759	8.5	128,547	10.2	1.7
Bachelor's degree	43,585,028	19.7	263,330	20.9	1.2
Graduate or professional degree	27,180,887	12.3	135,450	10.8	-1.5

Source: United States Census Bureau, "EDUCATIONAL ATTAINMENT 2017 American Community Survey 1-year Estimates," https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_1YR_S1501&prodType=table [accessed July 11, 2019]

As described in Table 25, a significant segment of Nebraska's population lacks a basic education. According to 2017 American Community Survey one-year Estimates, there are 1,445,479 adults (age 18 and older) in Nebraska. Of this number, 8.9 percent, or 128,319 adults, have less than a high school diploma. Education is an indicator of economic prosperity as illustrated in Table 26. Table 27 shows that nearly one in every four adults in Nebraska age 25 and older without a high school diploma (21.6 percent) live in poverty, and the average median wage in Nebraska for an adult with less than a high school diploma is $25,515.

Table 25. Poverty rate for Nebraska adults (25 years and over) for whom poverty status is determined by educational attainment level, 2017

Population group and educational attainment level	Nebraska estimated %	Nebraska estimated % - males	Nebraska estimated % - females
Less than high school graduate	21.6	16.8	26.8
High school graduate (includes equivalency)	10.3	8.7	11.9
Some college or associate's degree	7.6	5.6	9.5
Bachelor's degree or higher	3.1	3.2	3.0

Source: United States Census Bureau, "EDUCATIONAL ATTAINMENT 2017 American Community Survey 1-year Estimates," https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_1YR_S1501&prodType=table [accessed July 11, 2019]

Table 26. Median earnings in the past 12 months (in 2017 inflation-adjusted dollars) for Nebraska adults (25 years and over), 2017

Population group and educational attainment level	Nebraska estimated number	Nebraska estimated number - males	Nebraska estimated number - females
Population 25 years and over with earnings	$39,578	$46,279	$32,046
Less than high school graduate	$25,515	$30,165	$18,905
High school graduate (includes equivalency)	$31,296	$37,366	$24,409
Some college or associate's degree	$36,349	$44,973	$28,748
Bachelor's degree	$50,138	$60,441	$41,701
Graduate or professional degree	$61,324	$71,750	$55,598

Source: United States Census Bureau, "EDUCATIONAL ATTAINMENT 2017 American Community Survey 1-year Estimates," https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_1YR_S1501&prodType=table [accessed July 11, 2019]

Table 27. Adult (18 and older) educational attainment in Nebraska by race or ethnicity, 2016

Population group and educational attainment level	Nebraska estimated number	Nebraska estimated %	Nebraska estimated number - males	Nebraska estimated % - males	Nebraska estimated number - females	Nebraska estimated % - females
White alone	**1,131,814**	**-**	**555,199**	**-**	**576,615**	**-**
Less than high school (or equivalent)*	82,797	7.3	43,691	7.9	39,106	6.8
High school graduate or higher	1,049,017	92.7	511,508	92.1	537,509	93.2
Bachelor's degree or higher	367,900	32.5	172,938	31.1	194,962	33.8
White alone, not Hispanic or Latino	**1,051,542**	**-**	**513,062**	**-**	**538,480**	**-**
Less than high school (or equivalent)*	49,584	4.7	25,290	4.9	24,294	4.5
High school graduate or higher	1,001,958	95.3	487,772	95.1	514,186	95.5
Bachelor's degree or higher	358,709	34.1	167,824	32.7	190,885	35.4
Black alone	**53,583**	**-**	**26,904**	**-**	**26,679**	**-**
Less than high school (or equivalent)*	7,603	14.2	3,801	14.1	3,802	14.3

Population group and educational attainment level	Nebraska estimated number	Nebraska estimated %	Nebraska estimated number - males	Nebraska estimated % - males	Nebraska estimated number - females	Nebraska estimated % - females
High school graduate or higher	45,980	85.8	23,103	85.9	22,877	85.7
Bachelor's degree or higher	9,629	18.0	4,610	17.1	5,019	18.8
American Indian or Alaska Native alone	**8,527**	**-**	**4,374**	**-**	**4,153**	**-**
Less than high school (or equivalent)*	1,581	18.5	1,103	25.2	478	11.5
High school graduate or higher	6,946	81.5	3,271	74.8	3,675	88.5
Bachelor's degree or higher	797	9.3	298	6.8	499	12.0
Asian alone	**28,432**	**-**	**13,684**	**-**	**14,748**	**-**
Less than high school (or equivalent)*	6,387	22.5	2,163	15.8	4,224	28.6
High school graduate or higher	22,045	77.5	11,521	84.2	10,524	71.4
Bachelor's degree or higher	14,281	50.2%	7,352	53.7	6,929	47.0
Native Hawaiian and Other Pacific Islander alone	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**
Less than high school (or equivalent)*	NA	NA	NA	NA	NA	NA
High school graduate or higher	NA	NA	NA	NA	NA	NA
Bachelor's degree or higher	NA	NA	NA	NA	NA	NA
Some other race alone	**18,396**	**-**	**10,234**	**-**	**8,162**	**-**
Less than high school (or equivalent)*	8,759	47.6	4,512	44.1	4,247	52.0
High school graduate or higher	9,637	52.4	5,722	55.9	3,915	48.0
Bachelor's degree or higher	1,382	7.5	554	5.4	828	10.1
Two or more races	**17,598**	**-**	**8,606**	**-**	**8,992**	**-**
Less than high school (or equivalent)*	2,073	11.8	1,295	15.0	778	8.7
High school graduate or higher	15,525	88.2	7,311	85.0	8,214	91.3
Bachelor's degree or higher	4,519	25.7	2,153	25.0	2,366	26.3
Hispanic or Latino Origin	**102,067**	**-**	**54,288**	**-**	**47,779**	**-**
Less than high school (or equivalent)*	42,817	41.9	23,781	43.8	19,036	39.8
High school graduate or higher	59,250	58.1	30,507	56.2	28,743	60.2
Bachelor's degree or higher	11,159	10.9	5,897	10.9	5,262	11.0

* Calculated based on ACS data provided for high school graduate or higher and Bachelor's degree or higher.

Source: United States Census Bureau, "EDUCATIONAL ATTAINMENT 2017 American Community Survey 1-year Estimates," https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_1YR_S1501&prodType=table [accessed July 11, 2019]

Since 2010 – 2011, the number of students graduating from Nebraska's high schools has increased 6.1 percent.[1] The cohort four-year graduation rate has increased from 86 percent in 2010 - 2011 to 89 percent in 2017 - 2018. However, many students don't graduate high school, lessening their likelihood of financial and other successes and reducing the pool of students who could go on to postsecondary education.

Table 28 compares Nebraska public school graduation rates by gender, race/ethnicity, and other groups.

- White non-Hispanics had a 92 percent four-year graduation rate.
- Meanwhile, compared to their white non-Hispanic classmates, Native Americans had a graduation rate that was 21 percent lower. Black non-Hispanics were 14 percent lower, Hispanics were 11 percent lower, and Asians were 10 percent lower.
- The student group with the lowest graduation rate in 2017-2018 was English Language Learners, at 49 percent.

Table 28. Distributions of Nebraska public school graduates by gender, race/ethnicity and other groups 2017 - 2018

Student group	Graduates	4 year graduation rate %
Total Cohort Graduates	20,503	89
Gender: Male	10,312	86
Gender: Female	10,191	91
Race/Ethnicity: White non-Hispanic	14,627	92
Race/Ethnicity: Asian	483	82
Race/Ethnicity: Native Hawaiian/Other Pac. Islander	20	95
Race/Ethnicity: Hispanic	3,378	81
Race/Ethnicity: Native American	216	71
Race/Ethnicity: Black non-Hispanic	1,189	78
Race/Ethnicity: Two or More Races	590	85
Other Groups: Eligible for Free or Reduced Lunch	7,269	81
Other Groups: Special Education Students	1,815	69
Other Groups: English Language Learners	432	49

Source: Nebraska Coordinating Commission for Postsecondary Education, "2019 Nebraska Higher Education Progress Report," Table A3.1, https://ccpe.nebraska.gov/sites/ccpe.nebraska.gov/files/PR_2019.pdf [accessed July 11, 2019]

Language[2]

Table 29 provides information on Nebraskans who speak English and Spanish at home. Of the 1,788,397 Nebraskans age five years and older, 88.1 percent speak English only at home. Among the 212,756 (11.9 percent) who speak a language other than English at home. The majority (65.7 percent) speak Spanish; and nearly half (97,897) speak English less than "very well."

Table 29. Language spoken at home and ability to speak English, 2017

Language and Population Group	Nebraska Total Estimated Numbers	Nebraska Total Estimated Percent	Nebraska Estimated Numbers of specified language speakers - Speak English only or speak English "very well"	Nebraska % of specified language speakers - Speak English only or speak English "very well"	Nebraska Estimated Numbers of specified language speakers - Speak English less than "very well"	Nebraska % of specified language speakers - Speak English less than "very well"
Population 5 years and over	**1,788,397**	**-**	**1,690,500**	**94.5**	**97,897**	**5.5**
Speak only English	**1,575,641**	**88.1**	**-**	**-**	**-**	**-**

Language and Population Group	Nebraska Total Estimated Numbers	Nebraska Total Estimated Percent	Nebraska Estimated Numbers of specified language speakers - Speak English only or speak English "very well"	Nebraska % of specified language speakers - Speak English only or speak English "very well"	Nebraska Estimated Numbers of specified language speakers - Speak English less than "very well"	Nebraska % of specified language speakers - Speak English less than "very well"
Speak a language other than English	**212,756**	**11.9**	**114,859**	**54.0**	**97,897**	**46.0**
Spanish	**139,740**	**7.8**	**74,178**	**53.1**	**65,562**	**46.9**
5 to 17 years old	37,155	2.1	27,407	73.8	9,748	26.2
18 to 64 years old	95,217	5.3	44,176	46.4	51,041	53.6
65 years old and over	7,368	0.4	2,595	35.2	4,773	64.8
Other Indo-European languages	**28,874**	**1.6**	**20,677**	**71.6**	**8,197**	**28.4**
5 to 17 years old	4,809	0.3	3,402	70.7	1,407	29.3
18 to 64 years old	19,042	1.1	13,962	73.3	5,080	26.7
65 years old and over	5,023	0.3	3,313	66.0	1,710	34.0
Asian and Pacific Island languages	**29,139**	**1.6**	**13,363**	**45.9**	**15,776**	**54.1**
5 to 17 years old	4,909	0.3	3,123	63.6	1,786	36.4
18 to 64 years old	22,194	1.2	9,795	44.1	12,399	55.9
65 years old and over	2,036	0.1	445	21.9	1,591	78.1
Other languages	**15,003**	**0.8**	**6,641**	**44.3**	**8,362**	**55.7**
5 to 17 years old	3,809	0.2	1,014	26.6	2,795	73.4
18 to 64 years old	10,427	0.6	5,503	52.8	4,924	47.2
65 years old and over	767	0.0	124	16.2	643	83.8

Source: United States Census Bureau, "LANGUAGE SPOKEN AT HOME 2017 American Community Survey 1-year Estimates, Table S1601" https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk [accessed July 12, 2019]

[1] Nebraska Coordinating Commission for Postsecondary Education, "2019 Nebraska Higher Education Progress Report," Table A3.1, https://ccpe.nebraska.gov/sites/ccpe.nebraska.gov/files/PR_2019.pdf [accessed 11 Jul 2019]
[2] United States Census Bureau, "LANGUAGE SPOKEN AT HOME 2017 American Community Survey 1-year Estimates, Table S1601" https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk [accessed July 12, 2019]

Skills Gaps

A skills gap is present if it is difficult for a large share of employers to hire in a particular occupation and there is a persistent gap between the demand for new workers and the number of individuals entering that occupation. In the following studies of skills gaps, two key questions were asked.

- In what part of the labor force, if any, is a skills gap present?
- Is the skills gap the result of a lack of education and training opportunities or are other factors at work?

Central Nebraska

In 2016, the NDOL and NDED conducted two surveys regarding the skills of workers and skill needs of employers in the Central Nebraska area, which includes the Grand Island Metropolitan Statistical Area (MSA) and the Kearney and

Hastings areas. The two surveys were the *Central Nebraska Labor Availability Survey* and the *Central Nebraska Survey of Hiring and Training Needs*.

GRAND ISLAND AREA[1]

The study utilized the results of both surveys as well as secondary data about the Grand Island MSA economy to summarize information about job skills and whether skills gaps exist. The Grand Island MSA includes Hall, Hamilton, Howard, and Merrick counties.

Results of the skills gap study suggest that the annual flow of individuals into the Grand Island workforce is likely less than the projected annual needs of businesses. The annual needs of businesses are measured through job openings, which are due to both net job growth and the replacement of workers. These annual deficits of workers are found primarily in blue collar and service occupations. Annual deficits are most severe in select blue collar and service occupations, including production workers, office and administrative workers, sales and related workers and food preparation and services workers. Among service and blue-collar occupations, these annual deficits are further magnified because a significant share of workers are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. Grand Island MSA businesses also must work hard to attract and retain workers in these occupations. Specific occupations are listed below, along with the standard occupation code from the U.S. Bureau of Labor Statistics:

- registered nurses (SOC code 29-1141);
- automotive service technicians and mechanics (SOC code 49-3023);
- maintenance and repair workers, general (SOC code 49-9071);
- computer controlled machine tool operators, metal and plastic (SOC 51-4011);
- welders, cutters, solderers, and brazers (SOC code 51-4121); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

HASTINGS AREA[2]

The study utilized the results of both surveys as well as secondary data about the Hastings area economy to evaluate job skills and whether skills gaps exist. The Hastings area includes all or part of Adams, Clay, Fillmore, Nuckolls, and Webster counties.

Results of the study suggest that the annual flow of individuals into the workforce in the Hastings area will be less than the projected annual needs of businesses due to net job growth and the replacement of workers. These annual deficits of workers are found throughout the workforce but especially among blue-collar and service occupations. Annual deficits are most severe in service occupations, especially sales and related workers and food preparation and services workers. Among service and blue-collar occupations, these annual deficits are further magnified because a significant share of workers are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. A list of specific occupations is provided below, along with the standard occupation code from the US Bureau of Labor Statistics:

- registered nurses (SOC code 29-1141);
- automotive service technicians and mechanics (SOC code 49-3023);
- maintenance and repair workers, general (SOC code 49-9071);
- machinists (SOC code 51-4041);

- welders, cutters, solderers, and brazers (SOC code 51-4121); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

Kearney area[3]

The study utilized the results of both surveys as well as secondary data about the Kearney area economy to summarize information about job skills and whether skills gaps exist. The Kearney area includes all or part of Buffalo, Dawson, Franklin, Gosper, Harlan, Kearney, and Phelps counties.

Results of the study suggest that the annual flow of individuals into the workforce in the Kearney area will be less than the projected annual needs of businesses due to net job growth and worker replacement. These annual deficits are found throughout the workforce but especially among blue-collar and service occupations. Annual deficits are largest in service occupations, especially sales and related workers and food preparation and serving related workers. Among service and blue-collar occupations, these annual deficits are further magnified because a significant share of workers are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. A list of specific occupations is below, along with the standard occupation code from the US Bureau of Labor Statistics:

- registered nurses (SOC code 29-1141);
- automotive service technicians and mechanics (SOC code 49-3023);
- maintenance and repair workers, general (SOC code 49-9071);
- multiple machine tool setters, operators and tenders, metal and plastic (SOC 51-4081);
- welders, cutters, solderers, and brazers (SOC code 51-4121); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

Lincoln area[4]

In 2016, the NDOL and NDED conducted two surveys regarding the skills of workers and skill needs of employers in the Lincoln region of Nebraska, which includes Lancaster County and the surrounding areas. The two surveys were the *Lincoln Area Nebraska Labor Availability Survey* and the *Lincoln Area Survey of Hiring and Training Needs*. The surveys were conducted during 2017. The Lincoln area includes the two counties of the Lincoln Metropolitan Area (Lancaster and Seward), all or most of five surrounding southeast Nebraska counties (Gage, Jefferson, Saline, Saunders, and York), and portions of four other adjacent counties (Butler, Cass, Fillmore, and Otoe). The two surveys are the Lincoln Area Labor Availability Survey and the Lincoln Area Survey of Hiring and Training Needs.

The current study utilizes the results of both surveys as well as secondary data about the Lincoln area to summarize information about job skills and whether a local skills gap is present. A skills gap is present if it is difficult for a large share of employers to hire in a particular occupation and there is a persistent gap between the demand for new workers and the number of individuals entering that occupation. Key questions include: In what part of the labor force, if any, is a skills gap present? And, is the skills gap the result of a lack of education and training opportunities, or are other factors at work?

Results of the study suggest that over the next decade the annual flow of individuals into the workforce in the Lincoln area will exceed the projected annual job openings due to net job growth and worker replacement. This annual surplus is present due to the large number of students who graduate from area universities, colleges, and community colleges, implying that there would be an abundance of new workers trained for white-collar occupations. Indeed, there is a significant surplus of entrants to openings in entry-level white-collar occupations in the Lincoln Metropolitan Area even as deficits persist in blue collar and service occupations. Among blue-collar occupations, there is an annual deficit for construction and extraction workers, production workers and transportation and material moving workers. There is an annual deficit for all service occupations except protective service workers. Large annual deficits are found for sales workers and food preparation and serving related workers. Among service and blue-collar occupations, these annual deficits are further magnified because a significant share of workers are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check. For white-collar occupations, the challenge is keeping a sufficiently large share of graduates in Lincoln to fill open positions.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship, and apprenticeship opportunities developed through collaboration between employers, training entities, and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. State government and local organizations also may choose to support education, training, and apprenticeships, perhaps by sharing the cost of these activities with employers. A list of specific skilled occupations is below, along with the standard occupation code. The last chapter of this report provides detailed analysis for these occupations.

- software developers (SOC code 15-1132);
- registered nurses (SOC code 29-1141);
- licensed practical and licensed vocational nurses (SOC code 29-2061);
- carpenters (SOC code 47-2031);
- maintenance and repair workers, general (SOC code 49-9071);
- machinists (SOC code 51-4041); and
- welders, cutters, solderers, and brazers (SOC code 51-4121).

Omaha area[5]

The Nebraska Departments of Labor and Economic Development led efforts to conduct two surveys during 2017 regarding the skills of workers and skill needs of employers in the Omaha Metropolitan Area, which includes five Nebraska and three Iowa counties. The two surveys are the Omaha Area Labor Availability Survey and the Omaha Area Survey of Hiring and Training Needs.

The current study utilizes the results of both surveys as well as secondary data about the Omaha area to summarize information about job skills and whether a local skills gap is present. A skills gap is present if it is difficult for a large share of employers to hire in a particular occupation and there is a persistent gap between the demand for new workers and the number of individuals entering that occupation. Key questions include: In what part of the labor force, if any, is a skills gap present? And, is the skills gap the result of a lack of education and training opportunities, or are other factors at work?

Results of the study suggest that over the next decade the annual flow of individuals into the workforce in the Omaha area will be several thousand less than the projected annual job openings due to net job growth and worker replacement. These annual deficits are found throughout the workforce but especially among blue collar and service occupations. There are also significant deficits in select white-collar occupations including computer and mathematical workers, architects and engineers, community and social service workers and teachers. Notably, annual deficits are not found for healthcare practitioners and only small annual deficits for found for business and financial and legal workers. There is an annual deficit for all blue-collar occupations, but the deficit is especially pronounced for transportation and material moving workers. There is an annual deficit for most service occupations and large annual deficits are found for office and administrative support workers, sales workers and food preparation and serving related workers. Among service and blue-collar occupations, these annual deficits are further magnified because a significant share of workers are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship, and apprenticeship opportunities developed through collaboration between employers, training entities, and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. State government and local organizations also may choose to support education, training, and apprenticeships, perhaps by sharing the cost of these activities with employers. A smoother system of work authorization for skilled non-citizens would be especially beneficial for hiring in information technology and construction occupations. A list of specific occupations is below, along with the standard occupation code. The last chapter of this report provides detailed analysis for these occupations.

- computer programmers (SOC code 15-1131);
- software developers (SOC code 15-1132);
- registered nurses (SOC code 29-1141);
- carpenters (SOC code 47-2031);
- maintenance and repair workers, general (SOC code 49-9071);

- machinists (SOC code 51-4041);
- welders, cutters, solderers, and brazers (SOC code 51-4121); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

Columbus area[6]

In the fall of 2017, the Nebraska Departments of Labor and Economic Development led efforts to conduct two surveys regarding the skills of workers and skill needs of employers in Northeast Nebraska, which includes the Columbus, Norfolk, and Fremont areas. The two surveys were the Northeast Nebraska Labor Availability Survey and the Northeast Nebraska Survey of Hiring and Training Needs.

The current study utilizes the results of both surveys as well as secondary data about the Columbus area economy to summarize information about job skills and whether a local skills gap is present. A skills gap is present if it is difficult for a large share of employers to hire in a particular occupation and there is a persistent gap between the demand for new workers and the number of individuals entering that occupation. Key questions include: In what part of the labor force, if any, is a skills gap present? And, is the skills gap the result of a lack of education and training opportunities, or are other factors at work? The Columbus area is composed of part or all of Boone, Butler, Colfax, Nance, Platte, and Polk counties.

Results of the study suggest that the annual flow of individuals into the workforce in the Columbus area will be less than the projected annual needs of businesses due to net job growth and worker replacement. These annual deficits are found throughout the workforce but especially among blue collar and service occupations. Annual deficits are largest in service occupations, especially sales and related workers, food preparation and serving related workers, and office and administrative support workers. There are also large deficits for production workers, and transportation and material moving workers. Among service and blue-collar occupations, these annual deficits are further magnified because a significant share of workers are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. A list of specific occupations is below, along with the standard occupation code from the U.S. Bureau of Labor Statistics. A detailed analysis for these occupations is provided in the last chapter of this report.

- registered nurses (SOC code 29-1141);
- maintenance and repair workers, general (SOC code 49-9071);
- welders, cutters, solderers, and brazers (SOC code 51-4121);
- computer controlled machine tool operators, metal and plastic (SOC code 51-4011); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

Fremont area[7]

In the fall of 2017, the Nebraska Departments of Labor and Economic Development led efforts to conduct two surveys regarding the skills of workers and skill needs of employers in Northeast Nebraska, which includes the Fremont, Columbus, and Norfolk areas. The two surveys were the Northeast Nebraska Labor Availability Survey and the Northeast Nebraska Survey of Hiring and Training Needs.

The current study utilizes the results of both surveys as well as secondary data about the Fremont area economy to summarize information about job skills and whether a skills gap is present. A skills gap is present if it is difficult for a large share of employers to hire in a particular occupation and there is a persistent gap between the demand for new workers and the number of individuals entering that occupation. Key questions include: In what part of the labor force, if any, is a skills gap present? And, is the skills gap the result of a lack of education and training opportunities, or are other factors at work? The Fremont area includes all or part of Burt, Cuming and Dodge counties, and Fremont receives commuters from Washington and Douglas counties.

Results of the study suggest that the annual flow of individuals into the workforce in the Fremont area exceeds the projected annual needs of businesses due to net job growth and worker replacement. This positive flow is evident in other survey findings. For example, relative to Columbus and Norfolk, Fremont employers are 10 percentage points

less likely to report difficulty with finding workers. Despite these positive overall trends, employers face imbalances for select occupations. In particular, there are more job openings than entrants among sales and related workers and food preparation and serving related workers. In other occupations, applicants for job openings may lack experience or training, or exhibit a "poor work history" (which typically means frequent job changes).

When hiring is difficult for high skill occupations, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities, and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. A list of specific occupations is below, along with the standard occupation code from the U.S. Bureau of Labor Statistics. These occupations are analyzed in more detail in the final chapter of this report.

- registered nurses (SOC code 29-1141);
- maintenance and repair workers, general (SOC code 49-9071);
- welders, cutters, solderers, and brazers (SOC code 51-4121);
- computer-controlled machine tool operators, metal and plastic (SOC code 51-4011); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

Norfolk area[8]

In the fall of 2017, the Nebraska Departments of Labor and Economic Development led efforts to conduct two surveys regarding the skills of workers and skill needs of employers in Northeast Nebraska, which includes the Norfolk, Columbus, and Fremont areas. The two surveys were the Northeast Nebraska Labor Availability Survey and the Northeast Nebraska Survey of Hiring and Training Needs.

The current study utilizes the results of both surveys as well as secondary data about the Norfolk area economy to summarize information about job skills and whether a skills gap is found within the area. A skills gap is present if it is difficult for a large share of employers to hire in a particular occupation and there is a persistent gap between the demand for new workers and the number of individuals entering that occupation. Key questions include: In what part of the labor force, if any, is a skills gap present? And, is the skills gap the result of a lack of education and training opportunities, or are other factors at work? The Norfolk area includes all or part of Cuming, Madison, Pierce, Stanton, and Wayne counties.

Results of the study suggest that the annual flow of individuals into the workforce in the Norfolk area will be less than the projected annual needs of businesses due to net job growth and worker replacement. These annual deficits are found throughout the workforce but especially common among blue collar and service occupations. Annual deficits are largest in service and blue-collar occupations, especially production workers, transportation and material moving workers, sales and related workers, office and administrative support workers and food preparation and serving related workers. These annual deficits are further magnified for service and blue-collar workers because a significant share of workers is difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. A list of specific occupations is below, along with the standard occupation code from the U.S. Bureau of Labor Statistics. A more detailed analysis is provided for these occupations in the last chapter of this report.

- registered nurses (SOC code 29-1141)
- maintenance and repair workers, general (SOC code 49-9071)
- welders, cutters, solderers, and brazers (SOC code 51-4121)
- computer-controlled machine tool operators, metal and plastic (SOC code 51-4011)
- heavy and tractor-trailer truck drivers (SOC code 53-3032)

Scottsbluff area[9]

NDOL and NDED conduct two surveys in 2015 regarding the skills of workers and skill needs of employers in the Scottsbluff area: the *Panhandle Labor Availability Survey* and the *Scottsbluff Survey of Hiring and Training Needs*. The surveys also asked about training requirements and needs.

The study utilized the results of both surveys as well as secondary data about the Scottsbluff area economy to summarize information about job skills and whether skills gaps exist. For the analysis, the Scottsbluff area is defined to include significant portions of the Nebraska Panhandle including Banner, Box Butte, Cheyenne, Dawes, Kimball, Morrill, Scotts Bluff, Sheridan and Sioux counties.

Results of the study suggest that the aggregate annual flow of individuals into the workforce in the Scottsbluff area is less than the projected annual needs of businesses due to net job growth and turnover (i.e., exits from the workforce). These annual deficits of workers are found for select white-collar occupations such as business and financial operations workers, and are more widespread in skilled blue-collar occupations. Annual deficits are most severe in service occupations, especially office and administrative workers, health support occupations, personal care and service workers, sales and related workers, and food preparation and services workers. These annual deficits are further magnified because a significant share of workers in service and skilled blue-collar occupations are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. The specific occupations are listed below, along with the standard occupation code from the US Bureau of Labor Statistics:

- management analysts (SOC code 13-1111);
- accountants and auditors (SOC code 13-2011);
- loan officers (SOC code 13-2072);
- computer systems analysts (SOC code 15-1121);
- computer programmers and software developers (SOC code 15-1131, 15-1132, 15-1133);
- network and computer systems administrators (SOC code 15-1142);
- computer user support specialists (SOC codes 15-1151);
- registered nurses (SOC code 29-1141);
- licensed practical nurses (SOC code 29-2061);
- industrial machinery mechanics (SOC code 49-9041); and
- maintenance and repair workers, general (SOC code 49-9071).

Southeast Nebraska[10]

In 2016, NDOL and NDED conducted two surveys regarding the skills of workers and skill needs of employers in Southeast Nebraska, which includes Nebraska City and nearby areas. The two surveys were the *Southeast Nebraska Labor Availability Survey* and the *Southeast Nebraska Survey of Hiring and Training Needs*.

The study utilized the results of both surveys as well as secondary data about the Southeast Nebraska economy to summarize information about job skills and whether skills gaps exist. Southeast Nebraska includes all or most of Johnson, Nemaha, Otoe, Pawnee, and Richardson counties in Nebraska and Fremont County in Iowa.

Results of the skills gap study suggest that the annual entrants into the Southeast Nebraska workforce are less than the projected job openings among blue collar and service occupations. Job openings result from both net job growth and the replacement of workers. Annual deficits are most severe in select blue collar and service occupation groups, including production workers, transportation and material moving workers, sales and related workers, and food preparation and serving related workers. Among service and blue-collar occupations, these annual deficits are further magnified because a significant share of workers are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities and other education institutions. These enhanced learning

opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. Southeast Nebraska businesses also must work hard to attract and retain workers in these occupations. Specific occupations are listed below, along with the standard occupation code from the US Bureau of Labor Statistics:

- loan officers (SOC code 13-2072);
- registered nurses (SOC code 29-1141);
- licensed practical and licensed vocational nurses (SOC code 29-2061);
- bookkeeping, accounting and auditing clerks (SOC code 43-3031);
- carpenters (SOC code 47-2031);
- farm equipment mechanics and service technicians (SOC 49-3041);
- welders, cutters, solderers, and brazers (SOC code 51-4121); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

Southwest Nebraska[11]

NDOL and NDED conducted two surveys in 2016 regarding the skills of workers and skill needs of employers in Southwest Nebraska, which includes the North Platte Micropolitan Statistical Area and nearby counties. The two surveys were the *Southwest Nebraska Labor Availability Survey* and the *Southwest Nebraska Survey of Hiring and Training Needs.*

The current study utilizes the results of both surveys as well as secondary data about the Southwest Nebraska economy to summarize information about job skills and whether skills gaps exist. Southwest Nebraska includes all or most of Chase, Dundy, Frontier, Hayes, Hitchcock, Keith, Logan, Lincoln, Perkins, and Red Willow Counties, and a portion of Southwest Dawson County.

Results of the skills gap study suggest that the annual flow of individuals into Southwest Nebraska workforce is half of the projected annual job openings of regional businesses. Job openings are due to both net job growth and the replacement of workers. A major contributor to this deficit is that annual outmigration of workers from the region. Annual outmigration of 200 workers accounts for 36 percent of the gap between annual job openings and workforce entrants.

Annual deficits of workers are found in most blue collar and service occupations and in select white-collar occupations. White-collar occupations with a large annual deficit between job openings and new entrants include teachers, business, and financial operations workers. Among blue-collar workers, large annual deficits are found for construction and extraction workers, production workers, installation, maintenance and repair workers and transportation and material moving workers. Among service workers, the largest annual deficits are found for office and administrative workers, sales and related workers and food preparation and serving related workers. Among both service and blue-collar occupations, annual deficits are further magnified because a significant share of workers are difficult to hire due to a "poor work history" (which typically means frequent job changes) or an inability to pass a background check.

For the more highly skilled occupations, potential employees can be prepared through enhanced training, education, internship and (in some cases) apprenticeship opportunities developed through collaboration between employers, training entities, and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. Southwest Nebraska businesses also must work hard to attract and retain workers in these occupations. Further, for blue-collar occupations in particular there may be a benefit to attracting more legal immigrants to Southwest Nebraska. Specific occupations are listed below, along with the standard occupation code from the US Bureau of Labor Statistics:

- loan officers (SOC code 13-2072);
- registered nurses (SOC code 29-1141);
- carpenters (SOC code 47-2031);
- automotive service technicians and mechanics (SOC code 49-3023);
- maintenance and repair workers, general (SOC code 49-9071);
- machinists (SOC code 51-4041);
- welders, cutters, solderers, and brazers (SOC code 51-4121); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

Valentine Nebraska[12]

NDOL and NDED conducted two surveys in 2018 regarding the skills of workers and skill needs of employers in the Sandhills region of Nebraska, which includes Cherry County and nearby counties. The two surveys were the *Valentine Nebraska Labor Availability Survey* and the *Valentine Survey of Hiring and Training Needs*.

The current study utilizes the results of both surveys as well as secondary data about the Sandhills region of Nebraska economy to summarize information about job skills and whether skills gaps exist. The Valentine area includes all or most of Blaine, Brown, Cherry, Grant, Hooker, Keya Paha, and Thomas counties in Nebraska and Todd and Tripp Counties in South Dakota as well as a portion of eastern Garden and Sheridan counties in Nebraska.

Results of the study suggest that over the next decade the annual flow of individuals into the workforce in the Valentine area will lag the projected annual job openings due to net job growth and worker replacement. This annual deficit is partly due to significant outmigration from the region. Larger deficits are found among teachers, health care practitioners, farm workers, office and administrative support workers and sales and related workers. For teachers and health care practitioners, efforts should be made to expand further on-line course opportunities so that students can earn degrees while living in the region. The state of Nebraska also can establish and expand incentive programs for students in these occupations to return to the region after receiving their degree.

Among service and blue-collar occupations, these annual deficits also can arise because a significant share of workers are difficult to hire due to a "poor work history," which typically means frequent job changes. There appears to be a large group of applicants who have some or all of the relevant occupation-specific skills, but who are still not appealing to employers due to a poor work history or an inability to pass a background check. This raises two key questions: is there a subset of workers in these occupations with potential to change, that is, to become more committed to and a better team member at work? And, how would workers who are able to change be identified? To answer these questions, there should be extensive discussion with human resources representatives and direct supervisors of workers regarding practical steps workers can take, if any, over time to change a poor work history into a good work history.

For all skilled blue-collar occupations such as construction and extraction, production, and installation, maintenance and repair, potential employees can be prepared through enhanced training, education, internship and apprenticeship opportunities developed through collaboration between employers, training entities and other education institutions. State government and local organizations also can participate by sharing the cost of these activities with employers. Specific occupations are listed below, along with the standard occupation code from the US Bureau of Labor Statistics:

- heavy and tractor-trailer truck drivers (SOC code 53-3032);
- licensed practical and licensed vocational nurses (SOC code 29-2061);
- farmworkers, farm, ranch and aquaculture animals (SOC code 45-2093);
- welders, cutters, solderers, and brazers (SOC codes 51-4121); and
- agricultural equipment operators (SOC code 45-2091).

O'Neill Nebraska[13]

NDOL and NDED conducted two surveys in 2018 regarding the skills of workers and skill needs of employers in the Niobrara River region of Nebraska, which includes Holt County and nearby counties. The two surveys were the *O'Neill Nebraska Labor Availability Survey* and the *O'Neill Survey of Hiring and Training Needs*.

The current study utilizes the results of both surveys as well as secondary data about the Sandhills region of Nebraska economy to summarize information about job skills and whether skills gaps exist. The O'Neill area includes all or most of Antelope, Boyd, Garfield, Holt, Keya Paha, Knox, Loup, Pierce, Rock and Wheeler counties and a portion of northern Boone County and western Cedar County. The two surveys are the O'Neill Area Labor Availability Survey and the O'Neill Area Survey of Hiring and Training Needs.

The current study utilizes the results of both surveys as well as secondary data about the O'Neill area to summarize information about job skills and whether a local skills gap is present. A skills gap is present if it is difficult for a large share of employers to hire in a particular occupation and there is a persistent gap between the demand for new workers and the number of individuals entering that occupation. Key questions include: In what part of the labor force, if any, is a skills gap present? And, is the skills gap the result of a lack of education and training opportunities, or are other factors at work?

Results of the study suggest that over the next decade the annual flow of individuals into the workforce in the O'Neill area will lag projected annual job openings due to net job growth and worker replacement. This annual deficit is partly due to significant outmigration from the area. Annual deficits are found for teachers, health care practitioners, and most blue-collar and service occupations. Among blue-collar occupations, the largest annual deficit is for farm workers, followed by production workers and transportation and material moving workers. Among service workers, the largest annual deficits are for office and administrative workers, sales and related workers and food preparation and serving related workers. Among service and blue-collar occupations, these annual deficits are further magnified because significant shares of workers are difficult to hire due to a "poor work history," which typically refers to frequent job changes.

For the more highly skilled blue-collar occupations with a deficit of workers, potential employees can be prepared through enhanced training, education, internship, and apprenticeship opportunities developed through collaboration between employers, training entities, and other education institutions. These enhanced learning opportunities should be combined with additional efforts to inform secondary school students, and their parents, about the earnings and other opportunities afforded by these occupations. State government and local organizations also may choose to support education, training, and apprenticeships, perhaps by sharing the cost of these activities with employers.

For teachers and health care practitioners, efforts should be made to expand further on-line course opportunities so that students can earn degrees while living in the region. The state of Nebraska also can establish and expand incentive programs for students to return to the rural regions after receiving their degree. A list of specific skilled occupations is below, along with the standard occupation code. The last chapter of this report provides detailed analysis for these occupations.

- registered nurses (SOC code 29-1141);
- licensed practical and licensed vocational nurses (SOC code 29-2061);
- farmworkers, farm, ranch, and aquaculture animals (SOC code 45-2093);
- welders, cutters, solderers, and brazers (SOC code 51-4121); and
- heavy and tractor-trailer truck drivers (SOC code 53-3032).

[1] Nebraska Department of Labor, "Grand Island Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/GrandIslandSkillsGap2016.pdf [accessed December 28, 2017]
[2] Nebraska Department of Labor, "Hastings Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/HastingsSkillsGap2016.pdf [accessed December 28, 2017]
[3] Nebraska Department of Labor, "Kearney Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/KearneySkillsGap2016.pdf [accessed December 28, 2017]
[4] Nebraska Department of Labor, "Lincoln Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/LincolnSkillsGap2018.pdf [accessed July 11, 2019]
[5] Nebraska Department of Labor, "Omaha Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/OmahaSkillsGap2018.pdf [accessed July 11, 2019]
[6] Nebraska Department of Labor, "Columbus Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/ColumbusSkillsGap2018.pdf [accessed July 11, 2019]
[7] Nebraska Department of Labor, "Fremont Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/FremontSkillsGap2018.pdf [accessed July 11, 2019]
[8] Nebraska Department of Labor, "Norfolk Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/NorfolkSkillsGap2018.pdf [accessed July 11, 2019]
[9] Nebraska Department of Labor, "Scottsbluff Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/Scottsbluff_Skills_Gap.pdf [accessed December 28, 2017]
[10] Nebraska Department of Labor, "Southeast Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/SoutheastSkillsGap2017.pdf [accessed December 28, 2017]
[11] Nebraska Department of Labor, "Southwest Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/SouthwestSkillsGap2016.pdf [accessed December 28, 2017]

[12] Nebraska Department of Labor, "Valentine Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/ValentineSkillsGap2019.pdf [accessed July 11, 2019]
[13] Nebraska Department of Labor, "O'Neill Skills Gap Report," https://neworks.nebraska.gov/admin/gsipub/htmlarea/uploads/ONeillSkillsGap2019.pdf [accessed July 11, 2019]

2. *Workforce Development, Education and Training Activities Analysis*

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

A. *The State's Workforce Development Activities*

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and 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.

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

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

C. *State Workforce Development Capacity*

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

State's workforce development activities

The education and skills needs of the workforce and the employment needs of employers, as identified above, are addressed through the plan partners' delivery of basic and individualized career services. Basic and individualized career services are provided in partnership with other required one-stop partners operating in Nebraska's comprehensive American Job Centers and other one-stop centers. Tables 30 and 31 identify the plan partners that provide each career service. In addition, local workforce development boards insure the involvement of other required and optional one-stop partners. Detailed descriptions of job seeker and employer services provided by each plan partner are described below in Sections VI and VII of this plan. All career services are accessible, physically and programmatically, to individuals with disabilities, including employers. Further, plan partners and required and additional one-stop partners assist employers through the delivery of other business services and described below under "key strengths."

Table 30. Basic and individualized career services provided by core partners

Basic & individualized career services	Title I Adult, Dislocated Worker	Title II Adult Education	Title III Wagner-Peyser	Title IV VR - General	Title IV VR - Blind
Eligibility determinations adult, dislocated worker, or youth programs	Yes	–	–	–	Yes
Outreach, intake (including worker profiling), and orientation to information and other services available through the one-stop delivery system.	Yes	Yes	Yes	–	Yes

Basic & individualized career services	Title I Adult, Dislocated Worker	Title II Adult Education	Title III Wagner-Peyser	Title IV VR - General	Title IV VR - Blind
For the TANF program, provide individuals with the opportunity to initiate an application for TANF assistance and non-assistance benefits and services.					
Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive services needs	Yes	Yes	–	–	Yes
Labor exchange services, including: • Job search and placement assistance, and career counseling • Recruitment and other business services on behalf of employers, including information and referrals to specialized business services other than those traditionally offered through the one-stop delivery system	Yes	Yes	Yes	Yes	Yes
Provision of referrals to and coordination of activities with other programs and services, including programs and services within the one-stop delivery system and, when appropriate, other workforce development programs	Yes	Yes	Yes	Yes	Yes
Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including: • Job vacancy listings in labor market areas; • Information on job skills necessary to obtain the vacant jobs listed; and • Information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those jobs	Yes	Yes	Yes	Yes	Yes
Provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of providers	Yes	Yes	Yes	Yes	–
Provision of information, in usable and understandable formats and languages, about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's one-stop delivery system	Yes	Yes	Yes	Yes	–
Provision of information, in usable and understandable formats and languages, relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including: • Child care; child support; medical or child health assistance available through the State's Medicaid program and Children's Health Insurance Program; benefits under SNAP; assistance through the earned income tax credit; and • assistance under a State program for TANF, and other supportive services and transportation provided through that program	Yes	Yes	–	Yes	Yes
Provision of information and meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation	Yes	–	Yes	–	Yes

Basic & individualized career services	Title I Adult, Dislocated Worker	Title II Adult Education	Title III Wagner-Peyser	Title IV VR - General	Title IV VR - Blind
Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA	Yes	Yes	–	Yes	Yes
Development of an individual employment plan, to identify employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve employment goals, including the list of and information about eligible training providers	Yes	Yes	–	Yes	Yes
Group [career] counseling	Yes	Yes	Yes	–	Yes
Individual [career] counseling	Yes	Yes	Yes	Yes	Yes
Career planning	Yes	Yes	Yes	Yes	–
Short-term pre-vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training	Yes			Yes	–
Internships and work experiences that are linked to careers	Yes	–	–	Yes	–
Workforce preparation activities	Yes	Yes	–	Yes	–
Financial literacy services	Yes	Yes	–	–	Yes
Out-of-area job search assistance and relocation assistance	Yes	–	–	Yes	Yes
English language acquisition and integrated education and training programs	Yes	Yes	–	–	Yes
Follow-up services, including counseling regarding the workplace, for participants in adult or dislocated worker workforce investment activities who are placed in unsubsidized employment, for up to 12 months after the first day of employment	Yes	Yes	–	Yes	–

Table 31. Basic and individualized career services provided by other plan partners

Basic & individualized career services	TANF	SNAP	Trade	JVSG	UI	SCSEP
Eligibility determinations adult, dislocated worker, or youth programs	Yes	–	–	–	–	–
Outreach, intake (including worker profiling), and orientation to information and other services available through the one-stop delivery system. For the TANF program, provide individuals with the opportunity to initiate an application for TANF assistance and non-assistance benefits and services.	Yes	Yes	–	Yes	–	–
Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive services needs	Yes	Yes	–	Yes	–	Yes
Labor exchange services, including: • Job search and placement assistance, and career counseling • Recruitment and other business services on behalf of employers, including information and referrals to specialized business services other than those traditionally offered through the one-stop delivery system	Yes	Yes	Yes	Yes	–	Yes
Provision of referrals to and coordination of activities with other programs and services, including programs and	Yes	Yes	Yes	Yes	–	Yes

Basic & individualized career services	TANF	SNAP	Trade	JVSG	UI	SCSEP
services within the one-stop delivery system and, when appropriate, other workforce development programs						
Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including: • Job vacancy listings in labor market areas; • Information on job skills necessary to obtain the vacant jobs listed; and • Information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those jobs	Yes	Yes	Yes	Yes	–	Yes
Provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of providers	–	–	Yes	Yes	–	–
Provision of information, in usable and understandable formats and languages, about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's one-stop delivery system	–	Yes	Yes	Yes	–	–
Provision of information, in usable and understandable formats and languages, relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including: • Child care; child support; medical or child health assistance available through the State's Medicaid program and Children's Health Insurance Program; benefits under SNAP; assistance through the earned income tax credit; and • assistance under a State program for TANF, and other supportive services and transportation provided through that program	Yes	Yes	Yes	Yes	–	Yes
Provision of information and meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation	–	–	Yes	–	–	–
Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA	Yes	Yes	Yes	Yes	–	Yes
Development of an individual employment plan, to identify employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve employment goals, including the list of and information about eligible training providers	–	Yes	Yes	Yes	–	Yes
Group [career] counseling	Yes	–	Yes	Yes	–	Yes
Individual [career] counseling	Yes	Yes	Yes	Yes	–	Yes
Career planning	Yes	Yes	Yes	Yes	–	Yes
Short-term pre-vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training	Yes	Yes	Yes	Yes	–	Yes
Internships and work experiences that are linked to careers	–	Yes	–	–	–	Yes
Workforce preparation activities	–	Yes	Yes	Yes	–	Yes
Financial literacy services	–	Yes	–	Yes	–	Yes
Out-of-area job search assistance and relocation assistance	–	Yes	Yes	Yes	–	–

Basic & individualized career services	TANF	SNAP	Trade	JVSG	UI	SCSEP
English language acquisition and integrated education and training programs	–	Yes	Yes	–	–	–
Follow-up services, including counseling regarding the workplace, for participants in adult or dislocated worker workforce investment activities who are placed in unsubsidized employment, for up to 12 months after the first day of employment	–	Yes	–	–	–	Yes

In addition to the services identified in Table 31, Nebraska's Trade program will also provide the following services:

- training/TRA;
- co-enrollment and referral to partner programs;
- wage subsidy for reemployed older workers;
- job search allowances;
- relocation allowances; and
- HCTC tax credit.

Detailed descriptions of program services and benefits for TANF and SNAP are provided in the respective program-specific sections of Section VII of this plan.

Strengths, weaknesses, and challenges of workforce development activities

Introduction

The Nebraska Workforce Development Board hosted the *Strategy Workshop: 2020 – 2024 State Plan for Nebraska's Workforce System*, on behalf of Governor Pete Ricketts and the state plan partners. The workshop was held on October 29, 2019 in Lincoln, Nebraska. The purpose of the workshop was to obtain input from the shareholders of Nebraska's workforce system. That input has been used by the state plan partners as they developed this plan for Nebraska's workforce system.

- 160 workforce system shareholders were invited to attend and represent the:
  - Nebraska Workforce Development Board, which includes representatives of businesses in Nebraska;
  - Greater Lincoln Workforce Development Board, which includes representatives of businesses in Nebraska;
  - Greater Nebraska Workforce Development Board, which includes representatives of businesses in Nebraska;
  - Greater Omaha Workforce Development Board, which includes representatives of businesses in Nebraska;
  - state plan partners;
  - required one-stop partners; and
  - other workforce system shareholders.
- 68 individuals registered to attend.
- 59 individuals attended.

The structure of the workshop was based on input needed by the state plan partners for development of this plan, including identification of the strengths and weakness of the workforce development activities identified in Section (A) above. The state plan partners identified the key strengths and weaknesses, challenges and opportunities, based on input provided by workshop attendees.

Key strengths

PLAN PARTNERS, REQUIRED AND OPTIONAL ONE-STOP PARTNERS, AND WORKFORCE SYSTEM PARTNERS

Collaboration among workforce system partners

Through strong collaborative relationships, plan partners, other required and optional required one-stop partners, and other workforce system partners, high-quality career and business services are provided, addressing the needs of the job seekers, workers, and employers. Key collaborations among partners include:

- secondary and postsecondary institutions, collaborative dual-credit secondary and postsecondary programs, and occupational training providers;
- earn-and-learn opportunities provided by community colleges, Registered Apprenticeship programs, and employer on-the-job training programs;
- a healthcare sector partnership among employers and training providers in the Greater Lincoln Workforce Development Area that matches occupational skills training opportunities with job seeker and worker skills needs;
- non-profit organizations that serve employers and specific job seeker and worker populations;
- JAG Nebraska (the Jobs for America's Graduates program operating in Nebraska), a state-based program, currently operating in the Greater Nebraska Workforce Development Area with plans to expand statewide, is dedicated to preventing high-school dropout among young people who have significant barriers to graduation or employment;
- SNAP Next Step, an employment and training program provided by the Nebraska Department of Health and Human Services and the Nebraska Department of Labor that places under-employed clients of the Supplement Nutrition Assistance Program in jobs that pay family-sustaining wages;
- foundations in the Greater Omaha Workforce Development Area that partner with government entities to serve job seekers and workers; and
- Omaha Public Power District (OPPD) Legacy Program, a program offered to high school seniors, provides opportunities for students to learn about character development and jobs available within OPPD and how to land those jobs.

Business-focused approach to employer services

Plan partners and other required and optional one-stop partners, in partnership with local workforce development boards and other workforce system partners, provide business-focused business services, including:

- job fairs, hiring events, and industry sector networks;
- Veteran-specific business services, including assistance with attracting, onboarding, and retention of Veterans and implementing Veteran-hiring initiatives;
- collaborative meetings among employers and workforce system partners and programs offering recruitment assistance and incentives;
- employer incentives, including tax incentives, grants from the Nebraska Department of Economic Development,[1] and grants from Nebraska's state-funded Worker Training Program;[2]
- incumbent worker and customized training services and referrals to specialized business services other than those typically offered through the one-stop delivery system;
- assistance with development of Registered Apprenticeship programs, including youth Registered Apprenticeship programs;
- business services for agricultural employers employing migrants and seasonal farmworkers;
- statewide and regional industry-specific labor market information, including information resulting from studies on labor availability, skills gaps, hiring and training needs;
- Rapid Response services for employers experiencing layoffs and business closures, including assistance Trade-effected employers;
- assistance with compliance with the requirements of Section 3 of Americans with Disabilities Act, nondiscrimination and equal opportunity requirements of WIOA Sec. 188 and 29 CFR Part 38, and other workplace accessibility requirements; and
- worksite modifications to accommodate the needs of individuals with special workforce needs.

Leveraging of resources to serve job seekers, workers, and employers

Plan partners and other required and optional required one-stop partners continue to successfully coordinate program services and maximize the availability of services for job seekers, workers, and employers and eliminate duplication of services. Leveraging of resources is achieved through:

- co-enrollment of individuals in partner programs;
- coordination of funding for program participants taking part in occupational skills training, including those participating in Registered Apprenticeship programs;

- coordination of funding for supportive services for program participants, including transportation services which is an essential supportive service in Nebraska, especially within the Greater Nebraska Workforce Development Area which covers 88 of Nebraska's 93 counties;
- cross-training of partner program staff on program eligibility requirements and program services;
- connecting employers with work-based training resources available through the Nebraska Department of Education Continuing Education Program and the US Department of Labor Office of Apprenticeship;
- coordination with resources offered by Nebraska's community colleges and private postsecondary career schools, as described below in Section III.2.G.;
- coordination of Rapid Response services with plan partners, required and optional one-stop partners, community-based organizations, local workforce development boards and chief elected officials, economic development organizations, education institutions, FEMA, NEMA, and Trade Adjustment Assistance as described below in Sections VI.a.2.B. – D.;
- coordination with economic development entities that support development and implementation of industry sector partnerships, including the Nebraska Department of Economic Development, as described below in Section III.2.I.;
- a written agreement between the Nebraska VR Program and Nebraska Department of Health and Human Resources Division of Behavioral Health regarding evidence-based supported employment services to individuals with behavioral health diagnoses, as described in subsection n.2.B. of the Vocational Rehabilitation – General program-specific section; and
- a written agreement between the Nebraska VR Program and Nebraska Department of Health and Human Resources Division of Developmental Disabilities regarding services for youth and adults.

These leveraging efforts are supported by the Nebraska Partner Council, a public sector partnership among plan partners, required and optional one-stop partners, and other workforce system partners. The Council was established in 2013 in an effort to better service Nebraska's job seekers, workers, and employers. The efforts of the Council are described below in detail in Section II.c.1.

STATE-SUPPORTED PROGRAMS

Worker Training Program

In accordance with Nebraska Revised Statutes §48-622.02 and 48-622.03, the Worker Training and Support Cash Fund is used to fund training opportunities that:

- expand the Nebraska workforce by increasing the pool of highly skilled workers in Nebraska;
- support public and private job training programs designed to train, retrain, or upgrade work skills of existing Nebraska workers of for-profit and not-for-profit businesses;
- recruit workers to Nebraska; and
- train new employees of expanding Nebraska businesses.

Economic development programs

As stated in Section III.a.2.I, the Nebraska Department of Economic Development funds economic development programs that benefit Nebraska communities and employers, such as:

- Community Development Block Grants program provides funding for community and economic development projects, including projects that benefit low- and moderate-income persons, prevent or eliminate slum or blight conditions, and solve catastrophic health and safety threats;
- Customized Job Training grant program, which provides assistance for employee training to businesses that create or retain quality jobs in Nebraska, including funding for on-the-job training; classroom training, onsite or at a local community college; and tuition and fees, training manuals, and other reasonable costs;
- Developing Youth Talent Initiative, which creates collaboration between Nebraska businesses and public schools and connects young Nebraskans to learning opportunities in the workforce that can play an important role in their decision to build their careers in our state; and

Intern Nebraska, which provides financial assistance to businesses who create new internships in Nebraska and employ students who are either in grades 11 or 12; enrolled full-time in a college, university, or other institution of higher education; or recent graduates from a college, university, or other institution of higher education.

JOB SEEKERS AND WORKERS

During the strategy workshop, attendees made note of an important factor affecting the key strengths of the plan partners and required and optional one-stop partners and the success of Nebraska's employers: strengths of job seekers and workers:

- willingness to learn and adapt to ever-changing labor market conditions and employer skills needs;
- resourcefulness;
- work ethic and motivation to succeed;
- diverse skills and backgrounds; and
- openness to and acceptance of change.

Key weaknesses, challenges, and opportunities

PLAN PARTNERS AND REQUIRED AND OPTIONAL ONE-STOP PARTNERS

Common intake procedures

The continuing lack of common intake procedures for job seekers, workers, and employers results in duplication of effort and inefficient use of resources across the statewide one-stop delivery system.

Progress has been made regarding common intake for job seekers and workers. A web-based common intake system was launched during Program Year 2019 for core-partner intake of potential program participants, as described below in Section III.b.1.A., but has not yet been universally implemented among all core partner programs at state and local levels, due in part to the lack of defined procedures for system usage across all core partner programs. In addition, usage has not yet been extended to other required and optional one-stop partners.

The state does not have a common intake system for employers, a definite weakness identified by strategy workshop attendees. The lack of such a system results in challenges created by employer fatigue, redundant outreach efforts by one-stop delivery system partners, and duplication of services. Workshop attendees, especially those representing businesses, identified this challenge as an opportunity for greatly improving service delivery to employers.

Employer engagement in the one-stop delivery system

Employer engagement with the one-stop delivery system continues to be a challenge for plan partners and other required and optional one-stop partners, even though there has been progress. There is willingness among employers to work collaboratively with one-stop delivery system partner programs, especially in relation to work-based education and training programs, which is apparent in the 31 percent increase in the number of Registered Apprenticeship programs across Nebraska since 2016, including youth Registered Apprenticeship programs. However, work remains to be done to increase employer engagement with other workforce development activities described above in Section (A) and the business services described in the Key Strengths section.

Geographic distribution of target populations

The geographic distribution of Nebraskans who face barriers to employment presents unique challenges regarding communication and coordination of services in areas where these populations reside. This includes remote rural areas, areas with capacity issues, and individuals affected by other factors that complicate service delivery, including basic skills deficiency, language barriers, and transportation.

Geographic size of the state in contrast to population

The State of Nebraska covers 76,824 square miles, making it the 16th largest state in terms of geographic area. In 2018, Nebraska's population was estimated at 1,929,268, with 55 percent of the state's population concentrated in three counties, Douglas, Lancaster, and Sarpy Counties (Omaha and Lincoln metro areas). The concentration of the state's population in three counties directly affects formula-funded core programs operating in the remaining 90 counties of the state, especially in relation the ability of those programs to serve remote rural areas effectively.

Communication among workforce system partners

Despite the availability of high-quality programs and a strong willingness to collaborate, the plan partners and other required and optional one-stop partners struggle at times to communicate in a timely fashion in order to coordinate programming and avoid duplication of services. This is especially true at the front-line service-delivery level.

Common terminology

Another weakness that disrupts communication among plan partners and required and optional one-stop partners is the lack of common terminology across one-stop delivery system partners and programs. This affects effective, efficient service delivery across the statewide one-stop delivery system.

JOB SEEKERS AND WORKERS

During the strategy workshop, attendees made note of a challenges faced by individuals, which directly affect the success of plan partners, other required and optional one-stop partners in meeting the workforce development needs of job seekers, workers, and employers:

- skills gaps;
- child care;
- housing;
- access to health care services and resources;
- access to transportation; and
- unrealistic expectations regarding hours, wages, and workplace benefits.

[1] Information on currently available grant opportunities through the Nebraska Department of Economic Development is accessible at https://opportunity.nebraska.gov/ded-resources/.
[2] Information on Nebraska's Worker Training Program is accessible at https://dol.nebraska.gov/EmploymentAndTraining/Training/WorkerTrainingProgram.

State workforce development capacity

The plan partners and other required and optional one-stop system partners have the capacity to deliver the workforce development activities described above in Section (A). Services are delivered to job seekers, workers, and employers onsite at four comprehensive American Job Centers and 12 additional one-stop centers. Services are also delivered electronically or virtually, as appropriate, through the partners' technology infrastructures. Business services are also delivered in-person at employer locations, and job seeker and worker services are delivered in-person at alternative locations for incarcerated individuals and individuals residing in remote rural areas who are not able to travel to a one-stop center or receive services electronically or virtually. Further, the plan partners and other required and optional one-stop system partners provide regular professional development for staff and program service providers. Technical assistance is also provided across partner programs, as needed.

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.

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 employment[8] 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.

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.)

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.

Vision

Nebraska's vision is to be a national model for the delivery of workforce development services.

Goals

Nebraska's two-part statewide goal for preparing an educated and skilled workforce that meets the needs of employers is:

- selection and prioritization of development of career pathways; and
- alignment of the state's workforce development system.

<u>Goals for career pathways</u>

Through collaboration with the state board, local boards, one-stop partners, and other workforce system partners across the state, all plan partners will work together to:

- select and prioritize development of career pathways for three or more in-demand sectors or occupations identified in Tables 9 through 12 of Section II.1.A;
- identify three or more barriers to participation in the selected and prioritized career pathways among job seekers and workers (including unemployed workers), Veterans, and individuals with barriers to employment, including:
    - 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;
    - individuals facing substantial cultural barriers;
    - eligible migrant and seasonal;
    - individuals within two years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program;
    - single parents (including single pregnant women); and
    - long-term unemployed individuals;
- identify five or more key barriers to participation in the selected and prioritized career pathways by employers and regional and local industry sector partnerships; and
- determine methods for addressing identified barriers to participation in the selected and prioritized career pathways among:
    - job seekers and workers, Veterans, unemployed individuals, individuals with disabilities, and other individuals with barriers to employment; and
    - employers, in general, as well as regional and local industry sector partnerships.

Goals for alignment

Through collaboration with the state board, local boards, one-stop partners, and other workforce system partners across the state, all plan partners will work together to:

- coordinate workforce development activities statewide, as well as regionally and locally;
- identify solutions for technology integration;
- broaden use of the state's common intake system;
- develop policies that support program and technology alignment;
- develop and disseminate online resources and information to support fully integrated customer service;
- develop and implement state-level cross training and technical assistance and cross training; and
- further the efforts of the state's public sector partnership.

Performance goals

Performance goals are provided in the program-specific sections for the core programs.

Assessment

Assessment of the overall effectiveness of Nebraska's workforce development system in relation to the state's vision and goals will involve the collaborative efforts of plan partners. Data will be collected and analyzed by plan partners, including employment rates, median earnings, credential attainment rates, measurable skills gains, employer services, and other data. This data will be derived from the plan partners' respective management information systems, as well as the Nebraska Longitudinal Data System (NELDS) described below in Section III.b.6.B. Data analysis will allow plan partners to identify trends in workforce system performance and initiate necessary program refinements as part of a continuous improvement approach. (Refer also to Section III.b.4. for additional information on assessment.)

c. State Strategy

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

1. *Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7) and includes registered apprenticeship. "In-demand industry sector or occupation" is defined at WIOA section 3(23).*

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

The state's strategies for implementation of the goals described in Section II.b.2 relating to career pathways are described below.

Selection and prioritization of development of career pathways

All plan partners will work together to identify best practices regarding development of new and existing career pathways, including best practices focusing on industry, public, and private sector partnerships that create customized workforce solutions and work-based training opportunities, such as Registered Apprenticeship programs, pre-apprenticeship programs, on-the-job training, and internships.

All plan partners will work together and use data provided by the Nebraska Department of Labor Office of Labor Market Information (refer to Tables 9 through 12 in Section II.1.A) to select and prioritize development of career pathways for three or more in-demand sectors or occupations.

During the selection and prioritization process and in relation to the identified best practices, All plan partners will work together to coordinate and collaborate with entities developing and implementing career pathways in Nebraska for in-demand sectors and occupations, such as:

- Career Pathways Advancement Project (CPAP);[1]
- Aksarben Foundation;[2]
- Blueprint Nebraska;[3]
- Nebraska Tech Collaborative;[4] and
- existing industry sector partnerships.

During the selection and prioritization process and in relation to the identified best practices, All plan partners will work together and coordinate and collaborate with the Strategy and Innovation Subcommittee of the Nebraska Workforce Development Board, which focuses on employer engagement, industry sector partnerships, and career pathways (described in Section III.a.1), as well as local boards and local area administrative entities, required and optional one-stop partners.

During the selection and prioritization process and in relation to the identified best practices, All plan partners will work together and coordinate and collaborate with:

- local boards and local area administrative entities;
- required and optional one-stop partners; and
- training providers across the state.

Identification of barriers to participation in selected and prioritized career pathways

<u>Job seekers and workers (including unemployed workers), Veterans, and individuals with barriers to employment</u>

All plan partners will work together to collectively identify five or more key barriers to participation in career pathways among job seekers and workers (including unemployed workers), Veterans, and individuals with barriers to employment (listed in Section II.b.2), including barriers relating to:

- geographic isolation;
- technology, especially for individuals in remote rural areas;
- disability;
- criminal history;
- homelessness;
- language barriers;
- literacy;
- cultural barriers;
- skills gaps;
- childcare;
- housing;
- health care services and resources;
- public-assistance dependency;
- transportation; and
- unrealistic expectations regarding hours, wages, and workplace benefits.

Employers and regional and local industry sector partnerships

All plan partners will work together and collectively identify five or more key barriers to participation in career pathways among employers and regional and local industry sector partnerships, including barriers relating to:

- industry sectors and occupations;
- geographic isolation, especially for employers in remote rural areas;
- limited English proficiency;
- skills gaps;
- cultural gaps;
- transportation;
- unrealistic expectations regarding hours, wages, and workplace benefits;
- worksite modifications to accommodate the needs of individuals with special workforce needs;
- access to and availability of necessary and related training services; and
- financial constraints.

Addressing identified barriers to career pathway participation

To identify methods for addressing identified barriers to participation in career pathways among job seekers and workers (including unemployed workers), Veterans, individuals with barriers to employment (listed in Section II.b.2), employers, and regional and local industry sector partnerships, All plan partners will work together with:

- the Strategy and Innovation Subcommittee of the Nebraska Workforce Development Board;
- local boards and local area administrative entities;
- required and optional one-stop partners;
- employers and regional and local industry sector partnerships; and
- training providers across the state.

Strategies for alignment

The state's strategies for implementation of the goals described in Section II.b.2 relating to alignment of all plan partner programs, required and optional one-stop partner programs, and other resources available in the state are described below.

Coordination of workforce development activities

The state will work to align partner programs, required and optional one-stop partner programs, and other resources available in the state by:

- coordinating workforce development activities across planning regions and local areas;
- inventorying and coordinating of services statewide to maximize service delivery for job seekers, workers, and employers; and
- researching and identifying technological resources that will support:
- integration of supportive services available throughout the one-stop delivery system; and
    - participation in career pathway programs by job seekers, workers, employers, and industry sector partnerships.

Technology integration

The state will continue to work to integrate technology across all plan partner programs and other required and optional one-stop partner programs to improve data sharing that provides time data necessary to initiate services across one-stop delivery system programs, assess service delivery, and meet performance-reporting requirements. Integrated technology would also support program refinements necessary for continuous improvement across the state's workforce development and one-stop delivery systems, including development of common intake procedures for the common intake system.

Common intake system

As described in Section III.b.1.A., Nebraska launched a common intake system for use by core partner programs to address a need for common intake procedures for job seekers and workers, which is identified as a key weakness in

Section II.a.2.C. Following launch of the system late in Program Year 2018, the Nebraska Department of Labor (NDOL) provided training on the system to core partners during the first quarter of Program Year 2019 (refer to Section III.b.1.A). As stated in Section II.a.2.C, use of the common intake system has not been universally implemented among all core partner programs at state and local levels, due in part to the lack of defined procedures for system usage across all core partner programs. Core partners will work to develop procedures for use of the system by state administered and locally administered core partner programs to increase system integration and use. In addition, expansion of system use for other plan partner programs and required and optional one-stop partner programs is under consideration.

Policy development

All plan partners will work individually and collectively to develop state-level policies that support program and technology alignment and collaboration at state, regional, and local levels, including policies regarding:

- memorandums of understanding and funding agreements;
- common intake;
- co-enrollment of participants;
- coordination of funding across programs; and
- priority populations and priority of service.

Online resources

The state will continue work to develop and disseminate online resources and information for all plan partner programs and other required and optional one-stop partner programs to support fully integrated customer service. For example, the Nebraska Workforce Development Board is currently working on an initiative to create an online database of workforce groups and initiatives that support and implement career pathways, with an ultimate goal of increasing awareness regarding career pathways and integrating their use among workforce system partners.

Cross training and technical assistance

The state will support and assist all plan partners and other required and optional one-stop partners as they work individually and collectively to develop and implement state-level cross training and technical assistance and cross training for state, regional, and local area administrative staff and required and optional one-stop partner programs regarding:

- workforce system initiatives;
- technology;
- program policies;
- program eligibility, services, and terminology;
- program performance;
- best practices; and
- other workforce development activities.

Co-enrollment

As described in Section III.b.2, policies supporting the state's implementation of its strategies include a performance accountability policy that defines mandatory co-enrollment requirements, whenever eligibility permits, for:

- local Title I youth, adult, and dislocated worker programs;
- Title III Wagner-Peyser Employment Service;
- Jobs for Veterans State Grant program;
- Trade Adjustment Assistance program; and
- Dislocated worker Grant programs, whether administered at the state- or local-level.

For the programs listed above, participants may be co-enrolled in include the following programs:

- local Title I youth, adult, and dislocated worker programs;
- Title II Adult Education and Family Literacy Act programs;
- Title III Wagner-Peyser Employment Service;

- Title IV vocational rehabilitation programs provided by the:
    - Nebraska Commission for the Blind and Visually Impaired; and
    - Nebraska Vocational Rehabilitation Program;
- Dislocated worker Grant programs, whether administered at the state- or local-level.
- Indian and Native American (INA) employment and training programs;
- Job Corps;
- Jobs for Veterans State Grant program;
- National Farmworker Jobs Program provided by Proteus;
- Senior Community Service Employment Program;
- Trade Adjustment Assistance program;
- Unemployment Insurance, including NEres, Nebraska's RESEA program; and
- employment and training programs provided by:
    - Supplemental Nutrition Assistance Program (SNAP); and
    - Temporary Assistance for Needy Families program (TANF);
- YouthBuild.

Plan partners will work together and support development of co-enrollment policies for Title II, Title IV, SCSEP, SNAP, and TANF partner programs.

Public sector partnership

All plan partners, other required and optional one-stop partners, and other workforce system partners actively participate in the Nebraska Partner Council. The council was established in 2013 by state-level partners and programs, including core partners, other plan partners, and other required and optional one-stop partners to strengthen state-level partnerships that focus on:

- increasing access to and opportunities for the individuals served by Nebraska's one-stop delivery system regarding employment, education, training, and support services;
- improving the workforce system through:
    - coordination of funding streams;
    - targeted distribution of available funding streams;
    - coordination with planning regions and local workforce development areas to strengthen workforce system alignment;
    - targeted outreach to disadvantaged populations; and
    - continuous improvement;
- supporting the alignment of the workforce, education, training, and economic development systems at state, regional, and local levels; and
- improving the quality and labor-market relevance of workforce investment, education, and economic development efforts through promotion of industry sector partnerships, career pathways, and regional service delivery strategies that provide:
    - job seekers and workers with occupational skills training and recognized postsecondary credentials that enable them to secure and advance in employment with family-sustaining wages; and
    - employers with the skilled workers they need to succeed in a global economy.

[1] Additional information on the Career Pathways Advancement Project is accessible at http://www.vr.nebraska.gov/pathways/.
[2] Information on the Aksarben Foundation is accessible at https://www.aksarben.org/.
[3] Information on Blueprint Nebraska is accessible at https://blueprint-nebraska.org/.
[4] Information on the Nebraska Tech Collaborative is accessible at https://nebtechcollab.com/.

III. Operational Planning Elements

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

a. State Strategy Implementation

The Unified or Combined State Plan must include–

1. State Board Functions

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

Board functions

The specific functions performed by the Nebraska Workforce Development Board pursuant to WIOA Sec. 101(d) include:

- developing and implementing the state plan;
- providing recommendations to help align the workforce system in the state;
- increasing activity in developing career pathways;
- unifying workforce investment activities with education and supportive services in the development of career pathways;
- improving outreach and access to programs;
- developing strategies for meeting the needs of employers and job seekers through sector partnerships (with an emphasis on in-demand industry sectors and occupations);
- developing and implementing the one-stop delivery system, including continuous improvement of the system;
- providing assistance to local boards, one-stop operators, and their partners;
- assisting with planning, including training and supportive services to workers, job seekers, and employers;
- identifying planning regions in consultation with local boards and CEOs;
- providing consultation to the Governor on the designation of local areas;
- assisting the Governor in the development and updating of comprehensive state performance accountability measures, including state-adjusted levels of performance, to assess the effectiveness of the core programs under 101(d)(4);
- developing policies to coordinate services;
- developing criteria and procedures for local board to use in assessing core programs;
- developing guidance for local boards on infrastructure costs and defining what required and additional one-stop partners must do to contribute to the services delivered through the one-stop delivery system
- defining the role and contributions of required one-stop partners, including methods for equitable and efficient cost allocation;
- developing strategies to improve technology for digital literacy and accelerating learning, accessibility, and professional development;
- reviewing the state plan at the end of the first two-year period of each four-year plan to submit modifications relating to labor market information, economic conditions, or other factors affecting the plan; and
- helping in designing evaluations of state programs under WIOA Section 116(e).

Implementation of the Nebraska Workforce Development Board's functions is achieved through the Board's structure of standing committees and subcommittees. This structure includes the Executive Committee (standing committee) and the Evaluation and Review Subcommittee, Policy and Oversight Subcommittee, and Strategy and Innovation Subcommittee. Each member of the Board participates in at least one committee or subcommittee as described below. The subcommittees provide:

- functional oversight of planning in relation to the Board's functions; and
- recommendations to the full Board on implementation of its functions.

The decisions of the Board are made according to the requirements and procedures established in Sections 4.5 - 4.8, 5.4, and 5.8 of the Board's bylaws.

Executive Committee

The Executive Committee has the authority to act on behalf of the Nebraska Workforce Development Board on issues that require action between scheduled Board meetings. As permitted under the bylaws of the Board, the Governor designates the members of the Executive Committee of the Board. Section 5.3 of the bylaws requires that the membership of the Executive Committee include:

- Chair of the Board;
- Vice Chair of the Board;
- Chair of each subcommittee of the Board (3);
- representative from the labor organization from the workforce category of Board membership;
- representative of an organization serving youth from the workforce category of Board membership;
- Commissioner of the Nebraska Department of Labor;
- Commissioner of the Nebraska Department of Education; and
- two representatives of the Board from the business and industry category; and
- one representative of the Board from the workforce category.

Subcommittees

EVALUATION AND REVIEW COMMITTEE

The Evaluation and Review Committee is assigned duties and responsibilities associated with evaluation and review of funding resources, the WIOA Title I annual report, WIOA Title I funding allocation formulas, the statewide labor market information system, and other duties as assigned by the Chair.

POLICY AND OVERSIGHT COMMITTEE

The Policy and Oversight Committee is assigned duties and responsibilities associated with policy development and oversight regarding the workforce development and one-stop delivery system, development of Nebraska's WIOA state plan, public sector partnerships, and other duties as assigned by the Chair.

STRATEGY AND INNOVATION COMMITTEE

The Strategy and Innovation Committee is assigned duties and responsibilities associated with strategy and innovation regarding employer engagement, industry sector partnerships, career pathways, connecting workforce efforts, workforce-related grants, system-related grants, technology solutions, data priorities, continuous improvement, and other duties as assigned by the Chair.

2. *Implementation of State Strategy*

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

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

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

Overview

Core programs will fund the activities and services described below to implement the state's strategies and create alignment across plan partner programs through the implementation of the strategies described above in Section II.c.

Title I adult, dislocated worker, and youth programs

Nebraska's Title I adult, dislocated worker, and youth programs provide the services described in this section. The programs also provide business services through business services representatives, in coordination the business services provided in coordination with the Title III Wagner-Peyser Employment Service.

Title I adult and dislocated worker programs

Title I adult and dislocated worker programs provide the basic and individualized career services described in Table 30 of Section II.a.2.A of this plan. In addition, the programs provide the following training services for program participants and employers:

1. occupational skills training, including training for nontraditional employment;
2. on-the-job training;
3. incumbent worker training ;
4. programs that combine workplace training with related instruction, which may include cooperative education programs;
5. training programs operated by the private sector;
6. skills upgrading and retraining;
7. entrepreneurial training;
8. transitional jobs;
9. job readiness training provided in combination with 1 or more of the training services listed in items 1 through 8;
10. adult education and literacy activities, including English language acquisition and integrated education and training programs provided concurrently or in combination with 1 or more of the training services listed in items 1 through 8; and
11. customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

Title I youth program elements

Title I youth programs provide the following 14 youth program elements:

1. tutoring, study skills training, instruction, and dropout prevention activities that lead to completion of a high school diploma or recognized equivalent;
2. alternative secondary school and dropout recovery services that assist youth who have struggled in traditional secondary education or who have dropped out of school;
3. paid and unpaid work experience, which are structured learning experiences in a workplace and provides opportunities for career exploration and skill development;
4. occupational skills training provided through an organized program of study that provides specific skills and leads to proficiency in an occupational field;
5. education offered concurrently with workforce preparation, an integrated education and training model combining workforce preparation, basic academic skills, and occupational skills;
6. leadership development opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors;
7. supportive services that enable an individual to participate in youth program activities;
8. adult mentoring, a formal relationship between a youth and an adult mentor with structured activities where the mentor offers guidance, support, and encouragement;
9. follow-up services provided following program exit to help ensure youth succeed in employment or education;
10. comprehensive guidance and counseling, which provides individualized counseling to participants, including drug/alcohol and mental health counseling;
11. financial literacy education that provides youth with the knowledge and skills they need to achieve long-term financial stability;
12. entrepreneurial skills training that provides the basics of starting and operating a small business and develops entrepreneurial skills;
13. services that provide labor market information and offer employment and labor market information about in-demand industry sectors or occupations; and
14. postsecondary preparation and transition activities that help youth prepare for and transition to postsecondary education and training.

Business services

Local Title I adult, dislocated worker, and youth programs provide business services, in partnership with the Title III Wagner-Peyser Employment Service and other one-stop partner programs, that meet the needs of employers in their respective local workforce development areas. Through the American Job Centers and other one-stop centers, Title I programs and one-stop center partners deliver business services that assist employers with their business-services

needs, which must include the provision of labor exchange services and labor marker information. In addition, business services provided to employers, employer associations, and other such organizations may include those described in 20 CFR § 678.435(b).

Title II Adult Education and Family Literacy Act

Nebraska's Title II program provides the career services described in Table 30 of Section II.a.2.A of this plan, in addition to the following services:

- workplace adult education and literacy activities;
- family literacy activities;
- integrated English literacy and civics education;
- integrated education and training;
- distance education;
- utilizing resources
- using information;
- working with others;
- understanding systems;
- transitional skills;
- civics education;
- rights and responsibilities of citizenship and civic participation ;
- career interest assessment;
- employability skills improvement;
- transition planning and preparation activities; and
- career pathways.

Title III Wagner-Peyser Act Employment Service

Nebraska's Wagner-Peyser Employment Service provides the career services described in Table 30 of Section II.a.2.A, as well as the services described in Wagner-Peyser program-specific Section VI. In addition, Wagner-Peyser coordinates its provision of business services with local Title I adult, dislocated worker, and youth programs provide business services and other one-stop partner programs, as described above. Through the American Job Centers and other one-stop centers, Wagner-Peyser delivers business services that assist employers with their business-services needs, which must include the provision of labor exchange services and labor marker information. In addition, business services provided to employers, employer associations, and other such organizations may include those described in 20 CFR § 678.435(b).

Title IV Vocational Rehabilitation Programs

Nebraska's Title IV vocational rehabilitation programs collectively provide the career services described in Table 30 of Section II.a.2.A of this plan, in addition to the following services:

- career interest assessment;
- community- and job-based evaluations;
- functional skills assessment;
- disability skills training;
- customized job training;
- academic/foundation skills education;
- computer literacy education;
- postsecondary credentialing;
- networking/peer counseling (job clubs) services;
- self-employment services;
- employer incentives; and
- worksite modification.

Alignment across the core programs and other state-plan partner programs

The activities described above will be aligned across all state plan partners programs to support implementation of the strategies described in Section II.c. through:

- collaboration and coordination among the plan partners and other workforce system partners;
- business-focused employer services; and
- leveraging of resources to service job seekers, workers, and employers.

Collaboration and coordination among workforce system partners

As described in detail in Section II.a.C, plan partners, other required and optional required one-stop partners, and other workforce system partners, deliver high-quality career and business services, through strong collaborative relationships that address the needs of the job seekers, workers, and employers. Collaboration and coordination among plan partners, other required and optional required one-stop partners, and other workforce system partners also occurs through the Nebraska Partner Council, a public sector partnership that includes all plan partners, other required and optional one-stop partners, and other workforce system partners (refer to Sections II.c and III.2,B). The Council meets regularly and Council members serve on the subcommittees of the Nebraska Workforce Development Board and provide guidance and feedback to the Board regarding one-stop and workforce delivery system activities, including career pathway programs and initiatives. Plan partners, in collaboration with the Board, the Council and local workforce development boards, other required and optional required one-stop partners, and other workforce system partners will implement the strategies described in Section II.c, through regular planning and implantation meetings.

Because programs and services provided among plan partners, other required and optional required one-stop partners, and other workforce system partners vary based on the focus of those programs and the requirements of their authorizing legislation, collaboration and coordination services at the service-delivery level is crucial to the implementation of the state's strategies. Service delivery staff will continue collaborate and coordinate services within and one-stop delivery system and outside of the system to ensure the availability of the full array of services within the state's workforce development system. This collaboration and coordination of services occurs through regular and ad hoc partner meetings, case management activities (including co-case management), and co-enrollment, as well as participation in regional and local workforce system initiatives by staff.

Business-focused approach to employer services

Plan partners will implement the career pathways strategies described in Section II.c in collaboration with the Board, the Council and local workforce development boards, other required and optional required one-stop partners, and other workforce system partners, as well as local are business services representatives. Employer engagement is essential to implementation of the career pathways strategies. High quality business-focused employer services are provided by plan partners, other required and optional required one-stop partners, and other workforce system partners, as described in Section II.a.2.C and include several that will support implementation of career pathways strategies:

- Veteran-specific business services, including assistance with attracting, onboarding, and retention of Veterans and implementing Veteran-hiring initiatives;
- collaborative meetings among employers and workforce system partners and programs offering recruitment assistance and incentives;
- employer incentives, including tax incentives, grants from the Nebraska Department of Economic Development,[1] and grants from Nebraska's state-funded Worker Training Program;[2]
- incumbent worker and customized training services and referrals to specialized business services other than those typically offered through the one-stop delivery system;
- assistance with development of Registered Apprenticeship programs, including youth Registered Apprenticeship programs;
- business services for agricultural employers employing migrants and seasonal farmworkers;
- statewide and regional industry-specific labor market information, including information resulting from studies on labor availability, skills gaps, hiring and training needs;
- assistance with compliance with the requirements of Section 3 of Americans with Disabilities Act, nondiscrimination and equal opportunity requirements of WIOA Sec. 188 and 29 CFR Part 38, and other workplace accessibility requirements; and
- worksite modifications to accommodate the needs of individuals with special workforce needs.

Leveraging of resources to serve job seekers, workers, and employers

Plan partners will implement alignment strategies described in Section II.c through collaboration with other required and optional required one-stop partners and the Nebraska Partner Council to coordinate program services and maximize the availability of services for job seekers and workers, including individuals with barriers to employment (listed in Section II.c.) and employers and eliminate duplication of services. As described in Section II.a.2.C, leveraging of resources will occur through:

- co-enrollment of individuals in partner programs;
- coordination of funding for program participants taking part in occupational skills training, including those participating in Registered Apprenticeship programs;
- coordination of funding for supportive services for program participants, including transportation services which is an essential supportive service in Nebraska, especially within the Greater Nebraska Workforce Development Area which covers 88 of Nebraska's 93 counties;
- cross-training of partner program staff on program eligibility requirements and program services;
- connecting employers with work-based training resources available through the Nebraska Department of Education Continuing Education Program and the US Department of Labor Office of Apprenticeship;
- coordination with resources offered by Nebraska's community colleges and private postsecondary career schools, as described in Section III.2.G;
- coordination of Rapid Response services with plan partners, required and optional one-stop partners, community-based organizations, local workforce development boards and chief elected officials, economic development organizations, education institutions, FEMA, NEMA, and Trade Adjustment Assistance as described below in Sections VI.a.2.B. – D.;
- coordination with economic development entities that support development and implementation of industry sector partnerships, including the Nebraska Department of Economic Development, as described in Section III.2.I.;
- a written agreement between the Nebraska VR Program and Nebraska Department of Health and Human Resources Division of Behavioral Health regarding evidence-based supported employment services to individuals with behavioral health diagnoses, as described in subsection n.2.B. of the Vocational Rehabilitation – General program-specific section; and
- a written agreement between the Nebraska VR Program and Nebraska Department of Health and Human Resources Division of Developmental Disabilities regarding services for youth and adults.

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.

Alignment with activities outside of the plan is described above in Section III.a.2.A.

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.

Alignment and coordination of services among plan partners, other required and optional required one-stop partners, and other workforce system partners is described in Section III.2.A.

The plan partner programs and required and optional one-stop partner programs will coordinate activities to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals, including individuals with barriers to employment (listed in Section II.c), populations identified in Section II.a.1.B., and individuals in remote areas.

- Plan partners provide the services described above in Section II.a.2.A. and below in Sections VI and VI through Nebraska's one-stop delivery system, which includes four comprehensive American Job Centers and 12 one-stop centers.
- Local workforce development boards provide access to:
    - career services and training services;
    - programs and activities carried out by required and optional one-stop partners, including supportive services; and
    - labor exchange services, including labor market information, job search, placement, and recruitment.
- Plan partners and other required and optional required one-stop partners coordinate program services and maximize the availability of services for job seekers, workers, and employers and eliminate duplication of services. Coordination of resources is accomplished through:
    - co-enrollment of individuals in partner programs;
    - coordination of funding for program participants taking part in occupational skills training, including those participating in Registered Apprenticeship programs;
    - coordination of funding for supportive services for program participants, including transportation services which is an essential supportive service in Nebraska, especially within the Greater Nebraska Workforce Development Area which covers 88 of Nebraska's 93 counties;
    - cross-training of partner program staff on program eligibility requirements and program services;
    - connecting employers with work-based training resources available through the Nebraska Department of Education Continuing Education Program and the US Department of Labor Office of Apprenticeship;
    - coordination with resources offered by Nebraska's community colleges and private postsecondary career schools, as described below in Section III.2.G;
    - coordination of Rapid Response services with plan partners, required and optional one-stop partners, community-based organizations, local workforce development boards and chief elected officials, economic development organizations, education institutions, FEMA, NEMA, and Trade Adjustment Assistance as described below in Sections VI.a.2.B. – D.;
    - coordination with economic development entities that support development and implementation of industry sector partnerships, including the Nebraska Department of Economic Development, as described below in Section III.2.I;
    - a written agreement between the Nebraska VR Program and Nebraska Department of Health and Human Resources Division of Behavioral Health regarding evidence-based supported employment services to individuals with behavioral health diagnoses, as described in subsection n.2.B. of the Vocational Rehabilitation – General program-specific section; and
    - a written agreement between the Nebraska VR Program and Nebraska Department of Health and Human Resources Division of Developmental Disabilities regarding services for youth and adults.

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.

Nebraska has a network of business services representative throughout the state that focuses on connecting employers to highly qualified and skilled job seekers. This network includes representatives from Title I programs, the Wagner-Peyser Employment Service, the Nebraska VR Program, the Nebraska Commission for the Blind and Visually Impaired, the Nebraska Department of Health and Human Services, the Nebraska Department of Economic Development, and the Nebraska Department of Education. This network of business services representatives:

- developed one unified document of available business services from all core partners;
- developed and implemented a multi-partner employer-focused committees throughout the state;
- conduct collaborative meetings with employers and various agencies offering recruitment assistance and incentives;
- assist with development and implementation of industry sector partner strategies, and
- host multi-partner job fairs, including job fairs for target populations, such as Veterans, ex-offenders.

In addition, plan partners and other required and optional one-stop partners, in partnership with local workforce development boards and other workforce system partners, provide business-focused business services, including:

- job fairs, hiring events, and industry sector networks;
- Veteran-specific business services, including assistance with attracting, onboarding, and retention of Veterans and implementing Veteran-hiring initiatives;
- collaborative meetings among employers and workforce system partners and programs offering recruitment assistance and incentives;
- employer incentives, including tax incentives, grants from the Nebraska Department of Economic Development,[1] and grants from Nebraska's state-funded Worker Training Program;[2]
- incumbent worker and customized training services and referrals to specialized business services other than those typically offered through the one-stop delivery system;
- assistance with development of Registered Apprenticeship programs, including youth Registered Apprenticeship programs;
- business services for agricultural employers employing migrants and seasonal farmworkers;
- statewide and regional industry-specific labor market information, including information resulting from studies on labor availability, skills gaps, hiring and training needs;
- Rapid Response services for employers experiencing layoffs and business closures, including assistance Trade-effected employers;
- assistance with compliance with the requirements of Section 3 of Americans with Disabilities Act, nondiscrimination and equal opportunity requirements of WIOA Sec. 188 and 29 CFR Part 38, and other workplace accessibility requirements; and
- worksite modifications to accommodate the needs of individuals with special workforce needs.

Layoff aversion services will also be provided to reduce the number of layoffs and closures, through the coordinated efforts of state agencies such as the Nebraska Department of Labor and the Nebraska Department of Economic Development, local chambers of commerce, and the local business services representatives.

[1] Information on currently available grant opportunities through the Nebraska Department of Economic Development is accessible at https://opportunity.nebraska.gov/ded-resources/.
[2] Information on Nebraska's Worker Training Program is accessible at https://dol.nebraska.gov/EmploymentAndTraining/Training/WorkerTrainingProgram.

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).

The state's strategies described in Section II.c. regarding development of career pathways and initiatives will rely heavily on engagement with the state's community colleges and area career and technical education schools. These institutions coordinate with Nebraska's employers to ensure programs align with and support Nebraska's in-demand industry sectors and occupations. Six community colleges serve the central, mid-plains, northeast, southeast, western, and metropolitan regions of the state. These institutions are tremendous partners in the workforce development efforts occurring within their respective regions:

- providing high-quality and affordable education and training programs along career pathways;
- coordinating programming with four-year institutions;
- developing and maintaining relationships with regional and local employers to align curriculum with industry and occupational needs;
- coordinating bridge and other programs to increase access; and
- supporting placement of students in employment that provides family-sustaining wages.

The establishment of certificate training programs by the Nebraska VR Program also supports the state's strategies. The programs were developed through Nebraska VR's partnership with community colleges and employers from in-demand industry sectors to offer a short-term training and internship programs that will meet employer needs and result in long-term employment for participating individuals with disabilities.

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.

The state's strategies described in Section II.c. regarding development of career pathways and initiatives will also rely heavily on engagement with the state's other education and training providers, including secondary schools, four-year institutions, private postsecondary career schools, and Registered Apprenticeship programs. Like Nebraska's community colleges, these institutions and Registered Apprenticeship programs coordinate with Nebraska's employers to ensure programs align with and support Nebraska's in-demand industry sectors and occupations. Collectively, the four-year institutions, private postsecondary career schools, community colleges, and Registered Apprenticeship programs offer more than 700 programs on Nebraska's Eligible Training Provider List that provide occupational skills training and career pathways for in-demand occupations in Nebraska.

The state's strategies also rely on engagement with the state's public schools. The Nebraska Department of Education reVISION[1] program provides Nebraska public schools with the opportunity to analyze and transform their current career education systems in order to improve their ability to educate a qualified workforce that meets industry needs within an ever-changing economy. Working in collaboration with postsecondary education and regional workforce and economic development leaders, the reVISION program connects career educators, school administrators, school counselors, and industry professionals. Under the leadership of the Nebraska Department of Education and in partnership with the Nebraska Department of Economic Development and Nebraska Department of Labor, the reVISION program is a strategic approach for schools to analyze their current career education system and make plans, as needed, for adjustments.

[1] Additional information on reVISION is accessible at https://www.education.ne.gov/nce/revision/.

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).

The state's strategies described in Section II.c. regarding development of career pathways and initiatives will enable the state to leverage other Federal, state, and local investments.

- Registered Apprenticeship services provided by the Nebraska Department of Labor (NDOL) enhance access to workforce development programs provided by secondary schools, community colleges, private postsecondary career schools, four-year institutions. NDOL assists Nebraska's US Department of Labor Office of Apprenticeship with development of Registered Apprenticeship programs, including youth Registered Apprenticeship programs provided in partnership with public schools that provide the related instruction.
- Nebraska's Community College Gap Assistance Program offers financial aid to community college students taking non-credit courses that could lead to jobs in in-demand occupations. Financial aid is provided for low-income students who would not be eligible for Federal financial aid, although they are enrolled in college, because they are not enrolled in for-credit courses that lead directly to a degree. Gap Program funds are distributed to the state's six community colleges, which recruit and select eligible low-income students participating in eligible programs to receive grants. Eligible students must have a family income at or below 250 percent of Federal poverty guidelines. Student grants can be used for tuition, direct training costs, required books and equipment, and fees, including those for industry testing services and background check services.
- EducationQuest has college planning offices in Kearney, Lincoln, and Omaha where they provide resources that help students and parents research colleges, explore career options, search for scholarships, complete and file the FAFSA, and learn about student loans. All services are free and most are provided by appointment to provide families with one-on-one assistance. Students and parents also learn about college planning and financial aid through EducationQuest's statewide college fairs, educational planning programs, and financial aid programs. EducationQuest also creates college planning handbooks, newsletters, and brochures and distributes them to students and parents across the state.
- The EducationQuest Scholarship Program provides $1.55 million in scholarship funding each year to Nebraska's nonprofit public and private colleges. The colleges then award the funds to eligible students who demonstrate financial need, which may include middle-income as well as low-income students.

- Students who face significant obstacles to higher education are the target of the Reaching Your Potential Scholarship Program, a need-based renewable scholarship program that provides approximately $100,000 in scholarships each year. Applicants are referred to the program by Nebraska's community agencies and colleges.
- EducationQuest College Access Grants provide funding for Nebraska high schools that seek to develop or enhance college access activities within their school. The program's goal is to increase the number of Nebraska students going to college. Every two years, EducationQuest provides grants to approximately 15 high schools and commits funding to each school for four years. Funding amounts depend on the school's enrollment.
- EducationQuest's *KnowHow2GO* program provides four steps students in grades 8, 9, and 10 should follow to prepare for college. EducationQuest provides free *KnowHow2GO* materials for students, parents, counselors, and agencies and coordinates statewide activities and events to promote the program.
- The Susan T. Buffett Foundation offers scholarships to college students in Nebraska. Scholarships are awarded on a competitive basis to first-time entering freshmen who reside in Nebraska and graduates of a Nebraska high school with plans to attend a public institution in Nebraska and have demonstrated financial need.
- The Nebraska Opportunity Grant (NOG) program provides financial aid to students who are Nebraska residents; have not earned a bachelor's, graduate; or professional degree; have high financial need; and who are attending eligible postsecondary schools in Nebraska to earn a degree or credential. Scholarships are given based on financial need and can be renewed as long as academic and financial need requirements are met.
- The Federal Supplemental Educational Opportunity Grant Program awards grants to attend college for students that can demonstrate a great financial need.
- The Nebraska Rural Schools Scholarship is geared toward students in Nebraska that graduated from what is considered a rural high school. Rural is defined as a city or town with 10,000 or fewer residents. To qualify for the scholarship, students must have graduated in the top 10 percent of their class or be currently enrolled in college with at least a 3.5 grade point average. They must also be attending a community college, four-year college, or university within Nebraska.

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 state's strategies described in Section II.c. regarding development of career pathways and initiatives will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates, industry-recognized certificates, licenses, certifications, and credentials that are portable and stackable, through:

- coordination with entities implementing industry sector strategies focusing on in-demand jobs essential to the economic vitality of the state's communities and regions;
- scaling industry sector, public sector, and private partnerships that create customized workforce solutions and work-based training opportunities, including Registered Apprenticeship programs, and pre-apprenticeship programs;
- identification of barriers to participation in career pathway programs and initiatives by job seekers, workers, employers, and industry sector partnerships;
- inventory and coordination of services statewide to maximize service delivery for job seekers, workers, and employers; and
- identification of technological resources that support participation in career pathway programs by job seekers, workers, employers, and industry sector partnerships;
- certificate training programs established by the Nebraska VR Program based on business-driven partnerships with local community colleges and employers in in-demand industry sectors;
- promotion of career pathways and initiatives, including career readiness services;
- collaboration with workforce system partners that support career pathway programs and initiatives as described in Section III.a.2.Gs;
- integrated education and training activities that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster; and

- Integrated English Literacy and Civics Education activities that provide education services to English Language Learners, including professionals with degrees and credentials in their native countries, delivered in combination with integrated education and training.

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.

Core partners will coordinate activities identified in (A) with economic development entities, strategies, and activities in the state through engagement and collaboration with:

- Blueprint Nebraska, a strategic plan to create a new standard of sustainable economic prosperity for all Nebraskans which was developed through engagement of more than 2,000 individuals and 60 plan-development events and championed by business leaders, Nebraska's Governor, and the president of the University of Nebraska system; and
- programs provided by the Nebraska Department of Economic Development, such as:
    - Community Development Block Grants program provides funding for community and economic development projects, including projects that benefit low- and moderate-income persons, prevent or eliminate slum or blight conditions, and solve catastrophic health and safety threats;
    - Customized Job Training grant program, which provides assistance for employee training to businesses that create or retain quality jobs in Nebraska, including funding for on-the-job training; classroom training, onsite or at a local community college; and tuition and fees, training manuals, and other reasonable costs;
    - Developing Youth Talent Initiative, which creates collaboration between Nebraska businesses and public schools and connects young Nebraskans to learning opportunities in the workforce that can play an important role in their decision to build their careers in our state; and
    - Intern Nebraska, which provides financial assistance to businesses who create new internships in Nebraska and employ students who are either in grades 11 or 12; enrolled full-time in a college, university, or other institution of higher education; or recent graduates from a college, university, or other institution of higher education.

b. State Operating Systems and Policies

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

The state operating systems and policies that will support the implementation of the state's strategies described in Section II are described below in section 1 through 9.

1. State operating systems

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

A. State operating systems that support coordinated implementation of State strategies

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

The operating systems that support implementation of the state's strategies include case management, labor market information, labor exchange, common intake, and performance accountability systems. Collectively these systems provide information necessary to make data-driven decisions, and track and monitor program activities provided to employers, job seekers and workers (including unemployed workers), Veterans, and individuals with barriers to employment (listed in Section II.b.2). The data collected and maintained in the systems will be essential to implementation of the state's strategies as plan partners work together to make data-driven decisions in collaboration with the Strategy and Innovation Subcommittee of the Nebraska Workforce Development Board, the Nebraska Partner Council, local boards and local area administrative entities, required and optional one-stop partners, training providers across the state, and other workforce system partners. The systems supporting implementation of the state's strategies are described separately in the following sections.

NEworks

NEworks is a comprehensive web-based management information system used for service delivery, case management, documentation management, and performance reporting by Title I adult, dislocated worker, and youth programs; Title III Wagner-Peyser Employment Service; Trade Assistance Act; Jobs for Veterans State Grant program; and SNAP Next Step program. The management of multiple programs within a single system allows for integrated service delivery and performance reporting. NEworks also functions as Nebraska's self-service labor exchange for job seekers, workers, and employers; operating system for the Nebraska Department of Labor Unemployment Insurance Benefits and Tax; and labor market information platform. NEworks also provides additional resources, including a resume builder, assessment and communication tools, online learning, as well as Nebraska's Eligible Training Provider List.

OnBase Enterprise Content Management (ECM)

ECM is a content management system used in conjunction with NEworks to store supporting eligibility documentation and case-management documentation. The electronic format leads to increased efficiency with data storage, retrieval, documentation sharing across programs, and off-site monitoring. In addition, ECM provides for secure segregation of disability-related documentation.

QE2

QE2 is a web-based case management and fiscal reporting system used by the Nebraska VR Program. The application was written in Ruby on Rails, an open source object-oriented web framework, with a MySQL backend. End-user authentication utilizes the Nebraska Directory Services (NDS) framework. Development, hosting, and support are provided by Nebraska VR Program application developers and network administrators.

AWARE

AWARE is a client database management system used by the Nebraska Commission for the Blind and Visually Impaired that establishes:

- electronic reminders of service deadlines;
- ways for staff to communicate with each other about client needs and case service activities; and
- mechanisms for administrators to review work that is done, accomplishments made, and assessment of gaps in either the data management system itself or the Commission's service delivery system.

National Reporting System

The National Reporting System for Adult Education (NRS) is the accountability system for the federally funded adult education program, authorized by Section 212 of the Workforce Innovation and Opportunity Act (WIOA). The NRS includes the WIOA primary indicators of performance, measures that describe adult education students and their program participation, methodologies for collecting performance data, and program reporting procedures. NRS is an outcome-based reporting system for the state-administered, Federally funded adult education program. Developed by the US Department of Education's Division of Adult Education and Literacy (DAEL), NRS continues a cooperative process through which state adult education directors and DAEL manage a reporting system that demonstrates learner outcomes for adult education. The Nebraska Department of Education, as the State Eligible Agency (SEA) for WIOA Title II funding, utilizes LACES-LiteracyPro Systems, Inc. (LACES) to meet the NRS reporting requirement for Nebraska's Adult Education program

N-FOCUS

The Nebraska Family Online Client User System (N-FOCUS) is a computer software system used by the Nebraska Department of Health and Human Services' Temporary Assistance for Needy Families program. N-FOCUS is primarily an automated information database, but also contains many other functions. Public assistance programs, services, and information are stored on N-FOCUS, as well as providers and organizations.

Common Intake System

During Program Year 2018, Nebraska's core partners, in collaboration with the Nebraska Workforce Development Board, continued development of Nebraska's common intake system under the state's RSI-DWG. The core partners also participated and presented in WINTAC's facilitated discussion among vocational rehabilitation state grantees, during which a number of grantees presented on their approach to common intake and data sharing. As stated in Section II.c, following launch of the system late in Program Year 2018, the Nebraska Department of Labor (NDOL)

provided training on the system to core partners during the first quarter of Program Year 2019 (refer to Section III.b.1.A). Use of the common intake system has not been universally implemented among all core partner programs at state and local levels, due in part to the lack of defined procedures for system usage across all core partner programs (refer to Section II.a.2.C). Core partners will work to develop procedures for use of the system by state administered and locally administered core partner programs to increase system integration and use. In addition, expansion of system use for required and optional one-stop partners is under consideration.

Virtual One Stop (VOS) Greeter system

Under the RSI-DWG, the Nebraska Department of Labor, in collaboration with the Nebraska Workforce Development Board, acquired and launched the VOS Greeter system. The system provides the one-stop partners with enhanced capabilities to conduct real-time common intake and use common-intake data to make effective data-driven decisions.

Nebraska Longitudinal Data System (NELDS)

In 2015, Nebraska was awarded its second Workforce Data Quality Initiative Grant through the US Department of Labor. The grant funded the establishment of a warehouse of workforce data, Nebraska Longitudinal Data System (NELDS). In addition to the fiscal and management information systems described above, the core partners also participate in NELDS, along with:

- NDOL UI Benefits and Tax;
- Nebraska Department of Motor Vehicles; and
- all community and state colleges, the state's university system, and Carl Perkins.

NDOL has extended data sharing agreements to include records of the following workforce system partners and programs:

- INA programs;
- Nebraska Department of Corrections.
- Nebraska Department of Education;
- Nebraska Veterans Affairs;
- Temporary Assistance to Needy Families (TANF); and
- US Department of Labor State Office of Apprenticeship (RAPIDS).

The data housed in NELDS is robust. Customized reports can be developed based on the needs of organizations participating in NELDS.

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

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.[10] [10] For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

The state utilizes various methods for data-collection and reporting processes for programs and activities, as described above in section A and below in Sections III.b.4 and III.b.6.

2. The State policies that will support the implementation of the State's strategies

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

Introduction

Policies supporting the state's implementation of its strategies include provisions regarding co-enrollment and guidelines for contributions by state-administered one-stop partner programs to the one-stop delivery system.

Co-enrollment

Policies supporting the state's implementation of its strategies include a performance accountability policy that defines mandatory co-enrollment requirements, whenever eligibility permits, for:

- local Title I youth, adult, and dislocated worker programs;
- Title III Wagner-Peyser Employment Service;
- Jobs for Veterans State Grant program;
- Trade Adjustment Assistance program; and
- Dislocated worker Grant programs, whether administered at the state- or local-level.

For the programs listed above, participants may be co-enrolled in include the following programs:

- local Title I youth, adult, and dislocated worker programs;
- Title II Adult Education and Family Literacy Act programs;
- Title III Wagner-Peyser Employment Service;
- Title IV vocational rehabilitation programs provided by the:
    - Nebraska Commission for the Blind and Visually Impaired; and
    - Nebraska Vocational Rehabilitation Program;
- Dislocated worker Grant programs, whether administered at the state- or local-level.
- Indian and Native American (INA) employment and training programs;
- Job Corps;
- Jobs for Veterans State Grant program;
- National Farmworker Jobs Program provided by Proteus;
- Senior Community Service Employment Program;
- Trade Adjustment Assistance program;
- Unemployment Insurance, including NEres, Nebraska's RESEA program; and
- employment and training programs provided by:
    - Supplemental Nutrition Assistance Program (SNAP); and
    - Temporary Assistance for Needy Families program (TANF);
- YouthBuild.

Contributions by state-administered one-stop partner programs

The state's guidelines for contributions by state-administered one-stop partner programs to the one-stop delivery system include guidance to assist local workforce development boards, chief elected officials (CEOs), and local one-stop partners.

Local funding mechanism

Under the local funding mechanism, the local board, CEO, and one-stop partner agree to amounts and methods of calculating amounts the partner will contribute for funding of infrastructure and additional costs of one-stop delivery system operations.

INFRASTRUCTURE COSTS

The funding agreement must meet the following requirements with regard to infrastructure costs.[1]

1. Infrastructure costs must be funded through cash, fairly evaluated non-cash, and third-party in-kind partner contributions, including any funding from philanthropic organizations or other private entities or through other alternative financing options, to provide a stable and equitable funding stream for ongoing one-stop delivery system operations.
2. One-stop partner contributions must be negotiated among the local board, CEO, and partner and the amounts to be contributed must be included in the funding agreement.
3. The one-stop partner's proportionate share of funding must be calculated in accordance with the Uniform Guidance and based upon a reasonable cost allocation methodology[2] whereby infrastructure costs are charged to the partner relative to the benefit received by the partner's program and in proportion to the program's use of the one-stop center; and the costs must be allowable, reasonable, necessary, and allocable.
4. The one-stop partner's share must be periodically reviewed and reconciled against actual costs incurred and adjusted to ensure that actual costs charged to the partner are proportionate to the partner program's use of the one-stop center and relative benefit received.

ADDITIONAL COSTS

The funding agreement must meet the following requirements with regard to additional costs.[3]

1. The one-stop partner must use a portion of funds made available under its program's authorizing Federal legislation, or make fairly evaluated in-kind contributions, to pay the additional costs relating to the operation of the one-stop delivery system. These other costs must include costs associated with providing applicable career services and may include other costs, including shared services.
    a. Shared services costs may include the costs of shared services that are authorized for and may be commonly provided, through the one-stop partner program, to any individual, such as initial intake, assessment of needs, appraisal of basic skills, identification of appropriate services to meet such needs, referrals to other one-stop partners, and business services. Shared costs may also include shared costs of the local board's functions.
2. The one-stop partner's contributions to funding of additional costs related to operation of the one-stop delivery system may be cash, non-cash, or third-party in-kind contributions, consistent with 20 CFR § 678.720(c).
3. The one-stop partner's share of additional costs must be allocated according to the proportion of benefit received by the partner, consistent with the Federal legislation authorizing the partner's program, and consistent with all other applicable legal requirements, including Federal cost principles described in the Uniform Guidance or any corresponding similar regulation or ruling requiring that costs are allowable, reasonable, necessary, and allocable.
4. Additional costs agreed upon by the partners must be included in the funding agreement.

State funding mechanism

If the local board, CEO, and all required one-stop partners in a local area do not reach consensus on methods for sufficiently funding one-stop center infrastructure costs, the Governor must administer funding through the state funding mechanism. The Governor determines required one-stop partner contributions under the state funding mechanism. The Governor does not determine infrastructure cost contributions for:[4]

- Indian and Native American (INA) program grantees;[5]
- WIOA Title II (Adult Education and Family Literacy Act) programs;
- programs provided under WIOA Title IV by the Nebraska Commission for the Blind and Visually Impaired and the Nebraska Vocational Rehabilitation Program; or
- Career and Technical Education programs provided under the Perkins Act.

The amount to be contributed by WIOA Title II and IV programs and Career and Technical Education programs must be determined by the Commissioner of the Nebraska Department of Education in consultation with the Governor.[6]

The state funding mechanism provides funding for infrastructure costs only.[7] The local board must still come to agreement on funding of additional costs, which must be documented in the funding agreement. While required one-stop partners must pay their share of additional costs relating to the operation of the one-stop delivery system,[8] failure to reach consensus on funding of additional costs does not trigger the state funding mechanism.

Required elements of funding agreements

Funding agreement must include the following elements, regardless of the funding mechanism used (local or state):[9]

1. duration of the funding agreement, which may differ from the duration of the agreement;
2. budget for infrastructure and additional costs that must be reconciled periodically against actual costs incurred and adjusted accordingly to ensure that it:
    a. reflects a cost allocation methodology that demonstrates how infrastructure costs are charged to the one-stop partner in proportion to its use of the one-stop center and relative benefit received; and
    b. complies with Uniform Guidance[10] or any other corresponding similar regulation or ruling;
3. identification of the local board, CEO, and partner participating in the agreement;
4. steps the local board, CEO, and partner used to reach consensus or an assurance that the local area followed the requirements of this policy in relation to the state funding mechanism;
5. description of the process to be used among the local board, CEO, and partner to resolve issues during term of the agreement when the parties are at an impasse or consensus is not reached; and
6. description of the periodic review and modification process to ensure equitable benefit among all one-stop partners.

[1] 20 CFR § 678.715(a)
[2] Approaches to developing reasonable cost allocation methodologies are provided in the US Department of Labor "One-stop Comprehensive Financial Management Technical Assistance Guide – Part I," which is accessible at https://dol.nebraska.gov/webdocs/getfile/3f3bb9b3-a552-462a-a5aa-843e1526951d. The U.S. Department of Labor, Employment and Training Administration *Sample MOU and Infrastructure Costs Toolkit* also provides suggestions on cost allocation methodologies. The toolkit is accessible at https://strategies.workforcegps.org/resources/2018/02/21/01/51/Sample-MOU-and-Infrastructure-Costs-Toolkit.
[3] 20 CFR § 678.760
[4] 20 CFR § 678.730(c)
[5] INA program grantees are not required to contribute to funding of infrastructure or additional costs of one-stop centers [US Department of Labor, "Workforce Innovation and Opportunity Act (WIOA) One-Stop Infrastructure Costs – FAQs," December 27, 2016. https://www.doleta.gov/wioa/docs/FAQs-Infrastructure-Funding-Guidance-Dec-27-2016.pdf [accessed September 14, 2017]]
[6] 20 CFR § 678.730(c)(2)
[7] 20 CFR §§ 678.710 and 678.730(a)
[8] 20 CFR § 678.760(a)
[9] 20 CFR § 678.755
[10]*Uniform Guidance* refers to 2 CFR Part 200

3. State Program and State Board Overview

A. State Agency Organization

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

The organization and delivery systems at the state and local levels for plan partner programs fall under three leadership structures:

1. The Governor provides leadership for and oversight of the Nebraska Departments of Labor and Health and Human Services.
2. The Board of Commissioners provides leadership for and oversight of the Nebraska Commission for the Blind and Visually Impaired.
3. The State Board of Education provides leadership for and oversight of the Nebraska Department of Education.

Under the Nebraska Department of Labor are:

- Title I adult, dislocated worker, youth programs;
- Title III Wagner-Peyser Employment Service;
- Jobs for Veterans State Grant program;
- Trade Adjustment Assistance program; and
- Unemployment Insurance.

Under the Nebraska Department of Health and Human Services are:

- Senior Community Services Employment Program;
- Supplemental Nutrition Assistance Program; and
- Temporary Assistance for Needy Families program.

Under the Nebraska Commission for the Blind and Visually Impaired is Title IV Vocational Programs and Supported Employment.

Under the Nebraska Department of Education are:

- Title II Adult Education and Family Literacy Act programs; and
- Title IV Nebraska VR Program.

Local delivery of services for Title I adult, dislocated worker, and youth programs occurs in Nebraska's three local workforce development areas:

- Greater Lincoln Workforce Development Area:
  - Chief Elected Official: Mayor Leirion Gaylor Baird; and
  - Greater Lincoln Workforce Development Board;
- Greater Nebraska Workforce Development Area:
  - Chief Elected Officials Board, Chair: County Supervisor Pam Lancaster; and
  - Greater Nebraska Workforce Development Board;
- Greater Omaha Workforce Development Area:
  - Chief Elected Official: Mayor Jean Stothert; and
  - Greater Omaha Workforce Development Board.

B. State Board

Provide a description of the State Board, including—

The membership of the Nebraska Workforce Development Board currently comprises the Governor, one legislative representative, and 27 members who represent business, labor, workforce, community-based organizations, education, and government:

- 14 business representatives;
- 7 workforce and labor representatives;
- 3 individuals representing Titles I, II, III and IV;
- 1 local governance representative;
- 1 individual representing state-level economic development; and
- 1 individual representing a state-level one-stop partner program.

Nebraska's legislature is a unicameral, having only one chamber and, therefore, only one legislative representative.

There are currently two vacancies, one in the business category and one in the local governance category.

i. Membership Roster

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

The current membership roster for the Nebraska Workforce Development Board, including organization affiliations, is provided in Table 32.

Table 32. Nebraska Workforce Development Board membership roster

Name	Title	Organization	Category of Representation
Pete Ricketts	Governor	State of Nebraska	Governor
Joni Albrecht*	Senator	Nebraska State Legislature	Legislative
Elizabeth Babcock	Director of Communication and Talent Development	Adams Land & Cattle, LLC	Business
Troy Brooks	Vice President and General Manager	Nucor Steel Nebraska	Business
Brian E Deakin	HR Manager	BD Medical - Holdrege	Business
Michael Geary	Owner	CMG Holdings	Business
James Hanson, Jr.	Owner/Founder	inTouch Communications	Business
Mark Moravec (Chair)	Business Development Manager	Chief Industries, Inc.	Business
Kyle J. Nixon	General Manager	Novozymes	Business
Don Nordell	Director	Black Hills Energy	Business
Terri Ridder	HR Director	Franciscan Care Services, Inc.	Business
Bradley Schroeder	Director of Total Rewards	Children's Hospital & Medical Center	Business
Jennifer Sedlacek	Senior Director, PTC Operations	Union Pacific Railroad	Business

Name	Title	Organization	Category of Representation
Becky L. Stitt	Regional Human Resources Manager	Western Sugar Cooperative	Business
Carol A. Swigart	Owner/President	Hillaero Modification Center	Business, small
Lisa Wilson	Plant HR Manager	Case New Holland Industrial (CNHI)	Business
Vacancy**	---	---	Business
Greg Adams	Executive Director	Nebraska Community College Association	Workforce
Paul Turman	Chancellor	Nebraska State College System	Workforce
Gary D. Dixon, Jr	Financial/Secretary-Treasurer	Steamfitters and Plumbers Local 464	Workforce, Apprenticeship
Allan F Hale	Executive Director	National Electrical Contractors Association	Workforce, Labor Organization
Susan Martin	President/Secretary-Treasurer	Nebraska State AFL-CIO	Workforce, Labor Organization
Phil Bakken	Chief of Staff	University of Nebraska	Workforce, Youth
Jason Feldhaus	Vice President of Connected Youth Initiatives	Nebraska Children and Families Foundation	Workforce, Youth
John Albin	Commissioner	Nebraska Department of Labor	Lead state official with primary responsibility for Titles I and III
Lindy Foley	Director	Nebraska Vocational Rehabilitation	Lead state official with primary responsibility for Title IV - General
Tate Lauer	State Director of Adult Education	Nebraska Department of Education	Lead state official with primary responsibility for Title II
Kyle Arganbright	Mayor	City of Valentine	Local Chief Elected Official
Vacancy**	---	---	Local Chief Elected Official
Anthony Goins	Director	Nebraska Department of Economic Development	Lead state official representing economic development
Dannette R. Smith	CEO	Nebraska Department of Health and Human Services	Lead state official representing a one-stop partner program

* Nebraska's state legislature is a unicameral, having only one chamber. For that reason, the Nebraska Workforce Development Board includes only one legislative representative.
** Vacancy is due to resignation. Governor's office is in the process of making a new appointment.

ii. Board Activities

Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

All newly appointed members of the Nebraska Workforce Development Board (NWDB) are provided with an orientation that includes overviews of:

- purposes and requirements of the Workforce Innovation and Opportunity Act, including the required functions of state workforce development boards;
- responsibilities of NWDB members, including the assigned duties and responsibilities of NWDB subcommittees;
- the Board's bylaws;

Additionally, all NWDB members provided access to the Nebraska Department of Labor websites, which include:

- WIOA policies;
- employment data and program statistics;

- labor market information publications;
- statutes and regulations; and
- other workforce- and labor-related information.

Administrative support and guidance is provided to the NWDB by the Nebraska Department of Labor (NDOL) regarding planning, coordination, and development of:

- state plans and modifications;
- policies; and
- annual WIOA reports.

NDOL subject matter experts and advisors support the NWDB Executive Committee and subcommittees, which are described above in Section III.a.1.

4. Assessment and Evaluation of Programs and One-Stop Program Partners

A. Assessment of Core Programs

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

Core programs will be assessed each year based on the state's performance accountability measures and quality, effectiveness, and improvement of the core programs, broken down by core program provider. Assessment will be based on the core programs performance reports regarding negotiated levels of performance and the criteria established in 20 CFR § 677.190. Assessment may also be based on data derived from the Nebraska Longitudinal Data System (NELDS). NELDS provides the data necessary to assess trends in the progress of participants who are exiting from core programs and entering into, persisting in, and completing postsecondary education or entering into or remaining in employment, as described below in Section III.b.6. Assessments will be facilitated by the Nebraska Workforce Development Board in collaboration with the core partners and the Nebraska Department of Labor.

B. Assessment of One-Stop Partner Programs

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

Other plan partners and one-stop delivery system partner program services will be assessed each year. Assessments will be facilitated by the Nebraska Workforce Development Board, in collaboration with the plan partners and the Nebraska Department of Labor, and based on a standardized self-assessment form addressing the following factors:

1. operational and programmatic coordination;
2. service hours;
3. compliance with Equal Opportunity requirements established under 29 CFR Part 38, including physical and programmatic accessibility;
4. responsiveness to needs of one-stop delivery system customers;
5. applicable compliance with common identifier requirements;
6. provision of program services, including career services and youth program elements, as applicable;
7. priority of service, including Veterans' priority and Title I adult program priority, as applicable;
8. professional development for program staff;
9. customer satisfaction;
10. evaluations of internal operations;
11. compliance with applicable privacy laws and regulations, including FERPA; and
12. how local and regional and local planning goals established by local workforce development board align with and meet factors 1 through 11.

The form will be distributed annually by local area one-stop operators to local-level plan partner programs and other one-stop partner programs.

C. Previous Assessment Results

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

Assessments of the effectiveness of core programs and other plan partner programs and one-stop partner programs were not conducted during the preceding two-year cycle due to ongoing issues with the design of the planned methodology described in the state's 2018 plan modification. However, during the state-plan development workshop described in Section IV, plan partners and representatives of local workforce development areas developed the assessment methodologies described above in Sections III.b.4A and B, in collaboration with members of the Nebraska Workforce Development Board's Policy and Oversight Subcommittee and representatives from the Nebraska Department of Labor.

Subject to the ongoing limitations of the COVID-19 crisis, plan partners will collaborate with members of the Nebraska Workforce Development Board's Policy and Oversight Subcommittee and representatives from the Nebraska Department of Labor to:

- finalize development of the state's assessment methodology; and
- establish a timeline for assessment of the effectiveness of core programs and other plan partner programs and one-stop partner programs for the preceding plan two-year cycle.

Once assessment results are available, plan partners will coordinate with the Nebraska Workforce Development Board's Policy and Oversight Subcommittee and representatives from the Nebraska Department of Labor to evaluate the results and identify areas where adaptation of the state's strategies is required or appropriate.

D. Evaluation

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

Core partners will coordinate with the Nebraska Workforce Development Board, local workforce development boards, and state agencies responsible for core program administration regarding evaluations and research projects on activities of core programs. The state will use the Evaluation Readiness Assessment Tool and Evaluation Design Assessment Tool provided by Federal partners to:

- develop a clear understanding of the state's readiness to conduct rigorous evaluation;
- identify strengths and deficiencies;
- establish feasible steps to improve evaluation capacity to meet WIOA evaluation requirements; and
- highlight major design and implementation issues to consider when planning an evaluation project.

The state will use these tools to identify areas where technical assistance or additional resources may be needed from Federal partners. The state may also consider other evaluation models to meet evaluation requirements. In any case, the state will review current and recent evaluations conducted by the US Departments of Education and Labor to avoid duplicative efforts.

5. Distribution of Funds for Core Programs

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

A. For Title I Programs

Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

i. Youth Activities in Accordance with WIOA Section 128(b)(2) or (b)(3)

The state's program funding policy describes the methods and factors used to distribute funds to local areas for Title I youth programs. The state uses the formula defined in WIOA Sec. 128 (b)(2)(A)(i) for allocation of funds to local areas, subject to the minimum-percentage requirement defined in WIOA Sec. 128 (b)(2)(A)(ii).

Youth funds may be made available for obligation by local areas beginning April 1 for the program year that begins the following July 1. Youth funds are typically available for distribution to local areas on July 1. The availability of youth funds for distribution to local areas is subject to the requirements and limitations of Federal fiscal year appropriations for programs and activities carried out under WIOA Title I. Youth funds must be made available by the state for distribution to a local area by the latter of:

- 30 days after the funds are made available to the state; or
- seven days after the date of approval of the local plan or local plan modification

ii. Adult and Training Activities in Accordance with WIOA Section 133(b)(2) or (b)(3)

The state's program funding policy describes the methods and factors used to distribute funds to local areas for Title I adult programs. The state uses the formula defined in WIOA Sec. 133 (b)(2)(A)(i) for allocation of adult funds to local areas, subject to the minimum-percentage requirement defined in WIOA Sec. 133 (b)(2)(A)(ii).

Adult funds are available for obligation by local areas beginning July 1. Adult program year funds (also known as base funds) are typically available for distribution to local areas on July 1, and fiscal year funds (also known as advance funds) are typically available for distribution to local areas on October 1. The availability of adult funds for distribution to local areas is subject to the requirements and limitations of Federal fiscal year appropriations for programs and activities carried out under WIOA Title I. Adult funds must be made available for distribution by the state to a local area by the latter of:

- 30 days after the funds are made available to the state; or
- seven days after the date of approval of the local plan or local plan modification.

iii. Dislocated Worker Employment and Training Activities in Accordance with WIOA Section 133(b)(2) and Based on Data and Weights Assigned

The state's program funding policy describes the methods and factors used to distribute funds to local areas for Title I dislocated worker programs. Allocation of dislocated worker funds to local areas is based on factors and weights listed in Table 33, which are prescribed by the Governor as required under WIOA Sec. 133(b)(2)(B)(i) and subject to the minimum-percentage requirement defined in WIOA Sec. 133 (b)(2)(A)(iii).

Table 33. Dislocated worker allocation factors

Allocation Factor	Weight
Insured unemployment data	15%
Unemployment concentrations	15%
Plant closings and mass layoff data	20%
Declining industries data	5%
Farmer-rancher economic hardship data	5%
Long-term unemployment data	20%
Dislocated worker program enrollment data	20%
Total	100%

Calculation of dislocated worker allocations of funds is made in two steps.

1. The state determines the portion of the state's allotment of dislocated worker funds to be assigned to each allocation factor described in Table 33.
2. The state determines the percentage amount of the assigned portion to be applied to each local area for each allocation factor.

Dislocated worker funds are available for obligation by local areas beginning July 1. Dislocated worker program year funds (also known as base funds) are typically available for distribution to local areas on July 1, and fiscal year funds (also known as advance funds) are typically available for distribution to local areas on October 1. The availability of dislocated worker funds for distribution to local areas is subject to the requirements and limitations of Federal fiscal year appropriations for programs and activities carried out under WIOA Title I. Dislocated worker funds must be made available for distribution by the state to a local area by the latter of:

- 30 days after the funds are made available to the state; or
- seven days after the date of approval of the local plan or local plan modification.

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

From grant funds made available under section 222(a)(1) of the Act, the Nebraska Department of Education (NDE), as the State Eligible Agency (SEA), will award competitive multiyear 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.

NDE will require that each eligible provider receiving a grant use the funding to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently.

NDE will host a statewide request for proposals for WIOA Title II funding for Sections 231, 225 and 243. Eligible providers will identify the funding sources for which they are applying.

Eligible providers for Title II, as defined in Section 203(5), means an organization that has demonstrated effectiveness in providing adult education and literacy activities that may include -

1. a local educational agency;
2. a community-based organization or faith-based organization;
3. a volunteer literacy organization;
4. an institution of higher education;
5. a public or private nonprofit agency;
6. a library;
7. a public housing authority;
8. a nonprofit institution that is not described in any of subparagraphs (A) through (G) and has the ability to provide adult education and literacy activities to eligible individuals;
9. a consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described in any of subparagraphs (1) through (8); and
10. a partnership between an employer and an entity described in any of subparagraphs (A) through (I).

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.

Eligible providers may meet the requirements of demonstrated effectiveness in two ways;

1. An eligible provider that has been funded under title II of the Act must provide performance data required under section 116 to demonstrate past effectiveness.
2. An eligible provider that has not been previously funded under title II of the 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 above.

Eligible providers will submit an application to Nebraska Department of Education including information required by Nebraska Adult Education as well as items in Section 232 of WIOA, including:

- a description of how funds awarded under this title will be spent consistent with the requirements of this title;
- a description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
- a description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under Title I, as appropriate;
- a description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;
- a description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
- a description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
- information that addresses the considerations described under section 231(e), as applicable.

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

Nebraska Adult Education will ensure that all eligible providers have direct and equitable access to apply and compete for grants by issuing a request for proposals announcement through various media sources that are accessible by all applicants, to include; newspapers, State-sponsored social media and the Nebraska Department of Education website. Announcement of funding opportunity will not be sent to single sources or through other means during the competitive process. Requests for additional information or requests for grant applications will be directed to only those announcements to maintain direct and equitable access and to ensure fairness in the application process. All Nebraska Adult Education staff will be given specific instructions to follow during the competitive process.

During the competitive process, eligible providers will submit an intent to apply notice to the Nebraska Department of Education. Nebraska Department of Education, Adult Education will then send the same grant application to each applicant directly to ensure that only the same application is used by all applicants. Eligible applicants will submit an application for each funding source for which they are applying.

C. Vocational Rehabilitation Program

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

As per longstanding agreement, the Federal allotment of total dollars to Nebraska is divided as follows: 15.5 percent to the Nebraska Commission for the Blind and Visually Impaired and 84.5 percent to the Nebraska VR Program.

6. Program Data

A. Data Alignment and Integration

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

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

To support assessment and evaluation and the interoperability of management information systems, the Nebraska Department of Labor (NDOL) and the Nebraska Department of Education's Nebraska VR Program (NDE-VR) are currently working on an interface to exchange participant enrollment data between their respective systems to report

co-enrollment information between local Title I programs, Title III Wagner-Peyser Employment Service, Job for Veterans State Grant program, Trade Adjustment Assistance program, and Dislocated Worker Grant programs administered at state and local levels. The interface will run quarterly. In addition, data sharing agreements between NDOL and NDE-VR allow for reporting of aggregated co-enrollment data for the programs. Because of the data sharing agreements, NDOL is able to aggregate data provided by NDE-VR regarding the "effectiveness in serving employers" performance indicator.

NDOL and the Nebraska Department of Education (NDE) will continue to work together to share data between their respective management information systems in order to exchange common data elements in support of assessment and evaluation of core programs Title II and Title IV programs.

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

Under the state's 2017 RSI-DWG grant all plan partners intended to align data systems and support coordination and connectivity across partner programs and services with all plan partner legacy systems. During the two RFP processes, it became apparent that the partners would not be able to sustain the systems quoted due to excessively high post-grant system maintenance costs.

The partners elected to redirect focus under the RSI-DWG toward development and implementation of a common intake system. As described in Section III.b.1.A., Nebraska launched the common intake system for use by core partner programs to address a need for common intake procedures for job seekers and workers. Following launch of the system late in Program Year 2018, the Nebraska Department of Labor (NDOL) provided training on the system to core partners during the first quarter of Program Year 2019 (refer to Section III.b.1.A). As stated in Section II.a.2.C, use of the common intake system has not been universally implemented among all core partner programs at state and local levels, due in part to the lack of defined procedures for system usage across all core partner programs. Core partners will work to develop procedures for use of the system by state administered and locally administered core partner programs to increase system integration and use. In addition, expansion of system use for other plan partner programs and required and optional one-stop partner programs is under consideration. The plan partners will continue to work together to identify cost-effective methods for alignment and integration of partner data systems to facilitate streamlined intake and service delivery and tracking of participation all plan partner programs.

The RSI-DWG also provided for the purchase of the Virtual One Stop Greeter system (VOS Greeter), which is part of the Nebraska Department of Labor management information system, NEworks. The VOS Greeter is used in one-stop centers across the state. The VOS Greeter provides required and optional one-stop partners in each one-stop center with the ability to perform real-time common intake and make effective data-driven decisions. Using the VOS Greeter, one-stop center customers check in using a tablet or computer and identify which partner or partners they are there to meet. The system then sends an email alert to appropriate staff members, notifying them they have a customer. In addition, reports may be run using VOS Greeter data, identifying one-stop centers visited by customers, date and time of visits, reasons for visits, and staff members assisting customers.

Intake information collected under the common intake system and the VOS Greeter is information required universally by all plan partner programs. That information is used to determine program referrals, especially the information collected through the VOS Greeter based on the embedded checklist of that the one-stop customer uses to identify individual needs. Following referral to one-stop partner programs, including plan partner programs, program-specific information required by individual partners is collected by the respective program. For example, if a one-stop customer indicates interest in applying for TANF benefits during the common intake process, the customer is referred to the TANF program, either on-site or through direct linkage. In relation to TANF and SNAP specifically, individuals interested in applying for TANF or SNAP benefits can do so outside of the one-stop delivery system through ACCESSNebraska (http://dhhs.ne.gov/pages/accessnebraska.aspx).

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

The Nebraska Workforce Development Board (NWDB) will continue to assist the Governor, in collaboration with the Nebraska Department of Labor (NDOL), with alignment of technology and data systems across required one-stop partner programs. Assistance provided to the Governor by NWDB is facilitated through its subcommittees (described above in Section III.a.1) with guidance provided and supported by NDOL. Examples of alignment include the:

- common intake and the VOS Greeter systems (described above in Section III.b.1.A); and
- recent integration of the Nebraska Department of Labor's Unemployment Insurance (UI) program into the management information system, NEworks:
    - creating a streamlined experience for UI claimants;
    - providing efficient exchange of payment data and other elements required for accurate reporting;
    - supporting goals of NEres, Nebraska's RESEA program; and
    - providing information sharing and customer tracking capabilities between UI and NEres.

Alignment of technology and data systems improves service delivery to customers by increasing communication among partner programs that need to work together to ensure their shared customers are receiving the full array of available services from required one-stop programs.

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

As required under WIOA Section 116(i)(1), core partners have established and operate their respective fiscal and management information systems to meet the reporting requirements outlined in WIOA Section 116(d)(2). As described in Section III.b.1.A, the Nebraska Department of Labor (NDOL) uses NEworks, NDOL's management information system of record, to track and report reportable data elements for the Title I adult, dislocated workers, and youth programs and Title III Wagner-Peyer Employment Service, as well as the Trade Adjustment Act program; Jobs for Veterans State Grant program; and Dislocated Worker Grant programs. The Nebraska Department of Health and Human Services Supplemental Nutrition Assistance Program also uses NEworks (refer also to Section III.b.1.A). The Nebraska Department of Education, as the State Eligible Agency (SEA) for WIOA Title II funding, utilizes LACES-LiteracyPro Systems, Inc. to track and report reportable data elements and meet the NRS (National Reporting System) reporting requirements for Nebraska's Title II Adult Education program (refer also to Section III.b.1.A). The Nebraska VR Program (Title IV) utilizes QE2, a web-based case management and fiscal reporting system, to operate its fiscal and accountability data in order to record, track, and report required data elements. The Nebraska Commission for the Blind and Visually Impaired (Title IV) uses AWARE, a client database management system to track and report reportable data elements (refer also to Section III.b.1.A). In addition, local boards and CEOs use their respective fiscal systems for fiscal management and reporting, as required under WIOA Section 116(i)(1) and use NEworks to support NDOL's Title I performance-reporting activities.

B. Assessment of Participants' Post-program Success

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

Nebraska Longitudinal Data System (NELDS) provides the data necessary to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. Data from each program's management information system is populated in NELDS, including data from WIOA Titles I through IV, Trade Adjustment Assistance, UI Benefits, UI Tax, FEDES, SWIS, Career Technical Education postsecondary, and the Nebraska Department of Motor Vehicles.

NELDS establishes linkage processes to the Nebraska Department of Education Student and Staff Record System, using a combination of data elements to identify students (social security number, unique student identification number or name, gender, age, and other identifiers). This identification method was established to meet the requirements of Family Education Rights and Privacy Act (FERPA) regulations and provide for the collection of a variety of data, such as test scores, names of teachers, graduation rates, and transcripts, all of which are cross-referenced to postsecondary and workforce outcomes. Through wage matching in relation to the core programs and other programs and services described above, program managers and policymakers can determine:

- workforce and training services received;
- employment status during second and fourth quarters after program exit;
- median earnings during the second quarter after program exit;
- credential attainment rates; and
- use of UI benefits.

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

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

Through data sharing agreements with the Nebraska Department of Labor, core partner programs use UI wage records to assess workforce performance, as part of an overall strategy for performance accountability, evaluations, and as a source for workforce and labor market information. Nebraska signed the agreement to participant in the new State Wage Interchange System (SWIS) effective January 1, 2020. SWIS is the mechanism through which Nebraska can exchange wage data on an interstate basis with other states needing the wage data for WIOA performance reporting and is specifically designed to help facilitate the generation of aggregate statistical reports and subsequent analysis in satisfaction of Federal and state performance.

D. Privacy Safeguards

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

The state is committed to ensuring the privacy of all workforce participants. Plan partners recognize that information shared between the parties is subject Section 444 of the General Education Provisions Act (20 USC 1232g) and other applicable Federal privacy laws. Plan partners work with their respective legal counsels to review all interagency agreements involving data sharing and ensure the inclusion of provisions regarding:

- privacy safeguards;
- use of available data security protocols; and
- assurances to protect the privacy of data shared, manipulated, and extracted.

Plan partner staff accessing and utilizing protected data are subject to the privacy provisions of interagency agreements, as well as the data usage policies of their respective agencies, all of which define the purposes and proper use of protected data.

WIOA authorizes the collection of eligibility, enrollment, and participant data. Only the minimum number of data elements are maintained and shared between plan partners to meet WIOA performance reporting requirements. Any data released or shared between or among plan partners is in aggregate form and does not reveal personally identifiable information. Shared wage and education data will be used solely for:

- program administration;
- Federal and state reporting; and
- statistical research.

All necessary steps are taken to protect shared data from unauthorized disclosure and personally identifiable information will be destroyed when no longer needed for the purposes of performance reporting.

7. Priority of Service for Veterans

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

The state implements and monitors priority of service for Veterans in accordance with the requirements of the Jobs for Veterans Act regarding all employment and training programs funded in whole or in part by the US Department of Labor (USDOL). Priority of service requirements are established in the state's policy on priority populations and priority of service, including directives regarding local area policies and procedures on implementation of priority of service and monitoring of priority of service. Under the state's policy, the state requires that one-stop partner staff give priority for career services, training, and employment services as described below for Title I adult and dislocated worker programs, Title III Wagner-Peyser Employment Service, and JVSG.

Title I Adult Program

For the Title I Adult program, priority of service is based on the following structure:

1. First, to Veterans and eligible spouses of Veterans who are:
    a. recipients of public assistance;
    b. low-income; or
    c. basic-skills deficient;
2. Second, to individuals who are not Veterans and eligible spouses of Veterans but are:
    a. recipients of public assistance;
    b. low- income; or
    c. basic-skills deficient;
3. Third, to Veterans and eligible spouses of Veterans who are not:
    a. recipients of public assistance;
    b. low- income; or
    c. basic-skills deficient
4. Last, to non-Veterans who are not:
    a. recipients of public assistance;
    b. low- income; or
    c. basic-skills deficient.

Title I Dislocated Worker Program

Services to eligible WIOA dislocated worker program participants must be provided in the following order:[1]

1. First, the individual must meet the eligibility criteria described in WIOA Section 3(15) and the state's policy on program eligibility.
2. Second, if the individual meets program eligibility criteria *and* is a Veteran or eligible spouse of a Veteran, the individual must be given priority over dislocated workers who are non-Veterans.

Service members exiting the military, including recipients of Unemployment Compensation for Ex-Military members (UCX), generally qualify as dislocated workers.[2] Military spouses of service members exiting the military may also qualify as dislocated workers.[3]

Title III Wagner-Peyser Employment Service

Veterans and eligible spouses of Veterans must receive priority of service over all other Wagner-Peyser Employment Services program participants.[4]

JVSG

Disabled Veterans Outreach Program (DVOP) specialists must provide career services to eligible Veterans and eligible spouses of Veterans. DVOP specialists must prioritize services to:

- special disabled Veterans;[5]
- other disabled Veterans;[6] and
- other eligible Veterans who are economically or educationally disadvantaged.[7]

Further, DVOP specialists must limit their activities to providing services to eligible Veterans and eligible spouses who:[8]

- meet the definition of an individual with a Significant Barrier to Employment (SBE);[9] or
- are Veterans ages 18 through 24.

Outreach and processes

Priority of service for Veterans is highlighted and promoted on the state's Priority of Service webpage (https://dol.nebraska.gov/EmploymentAndTraining/Veterans/VeteranServices/PriorityofService), through distribution of program materials throughout the one-stop delivery system, and by workforce system partners.

All American Job Centers have integrated the JVSG program into their one-stop delivery system. Signage at one-stop centers promotes priority of service for Veterans and greeter staff asks individuals if they have ever served in the

military. If so, greater staff advises the individuals that they may qualify for Veterans' priority of service. In addition, all one-stop centers utilize the VOS (Virtual One Stop) Greeter. The VOS Greeter provides a digital checklist that is completed by staff or one-stop customers and identifies SBE's (Significant Barriers to Employment). (As described in Sections III.b.1.A and III.b.6.A.ii, The VOS provides the one-stop partners with enhanced capabilities to conduct real-time common intake and use common-intake data to make effective data-driven decisions.)

When a Veteran or eligible person is determined to have a Significant Barrier to Employment (SBE), they are referred to DVOP staff for individualized career services. DVOPs serve as case managers for Veterans having SBEs. At least one DVOP and/or LVER staff member is located in each region of the state along with at least one Wagner-Peyser Employment Service staff member trained and certified in Veterans programs by the National Veterans Training Institute.

If a Veteran or eligible person does not have an SBE, the individual still receives priority of service in programs funded in whole or in part by USDOL. If the individual is referred to a partner administering a USDOL-funded program, the individual's status as a Veteran or eligible person is communicated to the partner to ensure priority of service.

Monitoring priority of service

The State WIOA monitor assesses local area compliance with priority of service requirements established in the state's policy and in Federal law, rules, regulations, and guidance. In addition, the state's JVSG Program Coordinator conducts quality assurance reviews monthly, including reviews of participant records in the state's mismanagement information system, NEworks, to ensure that priority of service is occurring and consistently provided.

Local area priority of service

Local area compliance with the priority requirements established under the state's policy must be monitored by the local board or its designated local area monitor in accordance with its local area policy on monitoring. Monitoring must include a review of the processes established under the local area policy on ensuring priority of service.

[1] TEGL 22-04
[2] Ibid.
[3] TEGL 03-15
[4] TEGL 10-09; VPL 07-09
[5]*Special disabled Veteran*[5] means (1) a veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary for a disability rated at 30 percent or more or 10 or 20 percent in the case of a veteran who has been determined under 38 USC § 3106 to have a serious employment handicap; or (2) a person who was discharged or released from active duty because of service-connected disability.
[6]*Disabled Veteran* means[6] a Veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary; or a person who was discharged or released from active duty because of a service-connected disability.
[7]*Eligible Veteran* means a person who (1) served on active duty for a period of more than one-hundred eighty (180) days and was discharged or released therefrom with other than a dishonorable discharge; (2) was discharged or released from active duty because of a service-connected disability; (3) as a member of a reserve component under an order to active duty served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge; (4) or was discharged or released from active duty by reason of a sole survivorship discharge. The Secretary of Labor does not interpret the statutes to require priority to be given in the order that these groups are listed. Instead, DVOP specialists must provide the same priority to serving special disabled, other disabled and other Veterans prioritized by the Secretary, including those the Secretary has identified as having Significant Barriers to Employment.
[8] VPL 04-14; In recent years, Veterans ages 18-24 have experienced a higher rate of unemployment than other Veterans as well as non-Veterans of the same age. The Department of Labor is anticipating an increase in the number of Veterans 18-24 transitioning from active military service. This group of Veterans may also possess limited civilian work history, which can make transitioning to the civilian labor force more difficult. Based on these facts, the Secretary has determined Veterans between the ages of 18 and 24 may need and benefit from the intensive services provided by a DVOP specialist.
[9] See definition X. significant barrier to employment

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

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

EO reviews

The state's compliance with the requirements of WIOA Sec. 188 and the American with Disabilities Act regarding physical and programmatic accessibility is addressed under Nebraska's Nondiscrimination Plan, which includes provisions for Equal Opportunity (EO) reviews of the one-stop delivery system. The State WIOA Monitor performs the EO reviews.

Assistive technology

In 2016, the state submitted an Unemployment Insurance Supplemental Budget Request (SBR) to fund assistive technology upgrades in 11 one-stop centers. Following approval of the request, the state worked with the Assistive Technology Partnership (ATP) to identify components required to provide state-of-the art hardware and software to one-stop centers across the state. Based on the outcome of the consultation with ATP and available funding through the SBR, the state was able to upgrade assistive technology in 12 one-stop centers, as described in Table 34.

Table 34. Assistive Technology

Item	Quantity
Acrobat Reader	13
XY Tables	13
Merlin Smart Reader	13
Flex Station adjustable table	13
Kensington Privacy Monitor Screens	27
Contour Keyboard	14
Contour Mouse	14
Hearing Devices: Clearsounds Headset	13
Hearing Devices: Clearsounds Neck loop	13
Zoom Text Software Enterprise License	15
Dell Optiplex 5050 SFF XCTO PC's	14
Ultra Sharp 24" Monitors	27
Amplified Phone Clearsounds CSC 600	15

In addition, Nebraska's Title IV programs provide access in their respective offices to assistive technology, such as:

- computer screen magnification and screen reading software;
- HD camera to enlarge printed copy;
- adjustable height work surface table;
- 24" Ultra Sharp computer monitor;
- privacy monitor screen;
- accessible computer keyboard and mouse;
- amplified headset and neck loop amplifier, both with TCoil;
- amplified phone with option to use amplified headset or neck loop amplifier;
- OCR reading device that will verbally read aloud printed materials; and
- updated desktop PCs.

Staff training and support

In September 2018, training and support was provided for one-stop center staff and co-located partners to ensure appropriate use and application of assistive technology. One-stop center staff also received training and support on addressing the needs of individuals with disabilities. Further, after the Nebraska VR Program entered into an Order of Selection, each Nebraska VR office provided an overview of Nebraska VR's referral process and disability etiquette for their local one-stop center.

Non-discrimination and Equal Opportunity policy

The state's non-discrimination and equal opportunity policy requires that each local board insure its one-stop centers provide equal access to programs and services.

Physical accessibility requirements

Recipients[1] must insure that no qualified individual with a disability is excluded from participation in, or be denied the benefits of a recipient's service, program, or activity or be subjected to discrimination by any recipient because a recipient's facilities are inaccessible or unusable by individuals with disabilities.[2]

Programmatic accessibility

Each recipient must insure that all WIOA Title I financially assisted programs and activities are programmatically accessible, which includes:[3]

- providing reasonable accommodations for individuals with disabilities;
- making reasonable modifications to policies, practices, and procedures;
- administering programs in the most integrated setting appropriate;
- communicating with persons with disabilities as effectively as with others; and
- providing appropriate auxiliary aids or services, including assistive technology devices and services, where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, the program or activity.

Reasonable accommodations and modifications

With regard to employment and aid, benefits, service, and training, each recipient must:

- provide reasonable accommodation to qualified individuals with disabilities who are applicants, registrants, eligible applicants/registrants, participants, employees, or applicants for employment, unless providing the accommodation would cause undue hardship;[4] and
- make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless making the modifications would fundamentally alter the nature of the service, program, or activity.[5]

Communications

Each recipient must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others, including communications with program applicants and participants, applicants for employment and employees, members of the public, and their companions.[6]

Assurances[7]

Each recipient of WIOA Title I financial assistance must provide written assurances that it will adhere to and comply with the requirements of WIOA Sec. 188 and 29 CFR Part 38.

- In the case of a local board, the assurances are included in the local board's WIOA Title I grant agreement with NDOL.
- For all other recipients of WOA Title I financial assistance provided through the local board, the assurances must be provided in writing as part of an appropriate written agreement between the recipient and the local board or its authorized designee.

Equal Opportunity Notice[8]

Each recipient of WIOA Title I financial assistance must provide initial and continuing notice that it does not discriminate on any prohibited basis. The notice must be provided to:

- registrants;
- applicants;
- participants;
- applicants for employment and employees;

- unions or professional organizations that hold collective bargaining or professional agreements with the recipient;
- subrecipients that receive WIOA Title I financial assistance from the recipient; and
- members of the public, including those with impaired vision or hearing and those with limited English proficiency.

The notice must contain the specific wording identified in 29 CFR § 38.35.

Publications, broadcasts, and other communications

PUBLICATION OF THE EQUAL OPPORTUNITY NOTICE[9]

At a minimum, the Equal Opportunity Notice must be:

- posted prominently, in reasonable numbers and places, in available and conspicuous physical locations and on the recipient's web site pages;
- disseminated in internal memoranda and other written or electronic communications with staff;
- included in employee and participant handbooks or manuals regardless of form, including electronic and paper form if both are available;
- provided to each participant and employee; and
- made part of each participant's and employee's file and be a part of both paper and electronic files, if both are maintained.

In addition, the Equal Opportunity Notice must be:

- provided in appropriate formats to registrants, applicants, eligible applicants/registrants, applicants for employment and employees and participants with visual impairments;
- provided to participants in appropriate languages other than English;[10] and
- initially published and provided within 90 calendar days of the latter of January 3, 2017 or the first date the requirements of WIOA Sec. 188 and 29 CFR Part 38 apply to the recipient (i.e., within 90 days of first becoming a recipient).

Where the Equal Opportunity Notice has been given in an alternate format to registrants, applicants, eligible applicants/registrants, participants, applicants for employment and employees with a visual impairment, a record that the alternate-format notice has been given must be made a part of the employee's or participant's file.

PRINTED AND ELECTRONIC MATERIALS AND VERBALLY-PROVIDED INFORMATION[11]

Recipients must indicate:

- the WIOA Title I financially assisted program or activity in question is an equal opportunity employer/program; and
- auxiliary aids and services are available upon request to individuals with disabilities.

This requirement applies to recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or the public at large, to describe WIOA Title I financially assisted program or activities or the requirements for participation by recipients and participants. When these materials indicate that the recipient may be reached by voice telephone, the materials must also prominently provide the telephone number of the text telephone (TTY) or other equally effective telecommunications system, such as a relay service, videophone, or captioned telephone used by the recipient.

INFORMATION PROVIDED THROUGH NEWS MEDIA[12]

Recipients that publish or broadcast program information in the news media must ensure that the publications and broadcasts state that:

- the WIOA Title I financially assisted program or activity in question is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIOA Title I financially assisted program or activity is prohibited by Federal law); and
- auxiliary aids and services are available upon request to individuals with disabilities.

ORIENTATIONS

During each presentation to orient new participants, new employees, and/or the general public to its WIOA Title I financially assisted program or activity, a recipient must include a discussion of rights under the nondiscrimination and equal opportunity provisions of WIOA, including the right to file a complaint of discrimination with the recipient or CRC Director.[13] This information must be communicated in appropriate languages and in formats accessible for individuals with disabilities.[14] When possible, the Equal Opportunity Notice should be provided in print and signed by WIOA Title I program participants and employees of the recipient and retained on file.

Affirmative outreach[15]

Recipients must take appropriate steps to ensure that they are providing equal access to their WIOA Title I financially assisted programs and activities. These steps should involve reasonable efforts to include members of the various groups protected under 29 CFR Part 38, including but not limited to:

- individuals with limited English proficiency;
- individuals with disabilities;
- persons of different sexes and age groups; and
- persons of various racial and ethnic/national origin groups and religions.

Collection and maintenance of EO data[16]

Each recipient must collect data and maintain records the CRC Director finds necessary to determine whether the recipient has complied or is complying with the nondiscrimination and equal opportunity provisions of WIOA Sec. 188 and 29 CFR Part 38. The system and format in which the records and data are kept must be designed to allow the Governor and CRC to conduct statistical or other quantifiable data analyses to verify the recipient's compliance with WIOA Sec. 188 and 29 CFR Part 38.

Records must be collected and maintained on:

- program applicants;
- registrants;
- eligible applicants/registrants;
- participants;
- terminees;
- employees; and
- applicants for employment.

Each recipient must record the race/ethnicity, sex, age, and where known, disability status of the groups specified above. Beginning on January 3, 2019, each recipient must also record the limited English proficiency and preferred language of each applicant, registrant, participant, and terminee. This collected information must be stored in a manner that ensures confidentiality, and must be used only for the purposes of:

- recordkeeping and reporting;
- determining eligibility, where appropriate, for WIOA Title I financially assisted programs or activities;
- determining the extent to which the recipient is operating its WIOA Title I financially assisted program or activity in a nondiscriminatory manner; and
- other uses authorized by law.

MEDICAL AND DISABILITY-RELATED INFORMATION

Any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, must be collected on separate forms. All such information, whether in hard copy, electronic, or both, must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. Whether these files are electronic or hard copy, they must be locked or otherwise secured (for example, through password protection).

COMPLAINTS[17]

Each recipient must maintain, and submit to CRC upon request, a log of complaints filed with the recipient that allege discrimination on the basis of:

- race;
- color;
- religion;
- sex (including pregnancy, childbirth, and related medical conditions);
- national origin;
- age;
- disability;
- political affiliation or belief;
- citizenship; or
- participation in a WIOA Title I financially assisted program or activity.

The log must include:

- the name and address of the complainant;
- the basis of the complaint;
- a description of the complaint;
- the date the complaint was filed;
- the disposition and date of disposition of the complaint; and
- other pertinent information.

Information that could lead to identification of a particular individual as having filed a complaint must be kept confidential.

Where designation of individuals by race or ethnicity is required, the guidelines of the Office of Management and Budget must be used.

A service provider's responsibility for collecting and maintaining the information required under this section may be assumed by the Governor or local area grant recipient, as provided in the state's nondiscrimination plan.

INFORMATION TO BE PROVIDED TO CRC

Notification of administrative enforcement actions or lawsuits.[18] Each recipient must promptly notify the CRC Director when any administrative enforcement actions or lawsuits are filed against it alleging discrimination on the basis of:

- race;
- color;
- religion;
- sex (including pregnancy, childbirth, and related medical conditions);
- national origin (including limited English proficiency);
- age;
- disability;
- political affiliation or belief; or
- for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in a WIOA Title I financially assisted program or activity.

This notification must include the:

- names of the parties to the action or lawsuit;
- forum in which each case was filed; and
- relevant case numbers.

Compliance reviews and complaint investigations.[19] Each recipient, as part of a compliance review[20] or monitoring activity[21] conducted or carried out by the CRC Director, must provide the following information:

- the name of any other Federal agency that conducted a civil rights compliance review or complaint investigation, and that found the grant applicant or recipient to be in noncompliance, during the two years before the grant application was filed or CRC began its examination; and
- information about any administrative enforcement actions or lawsuits that alleged discrimination on any protected basis, and that were filed against the grant applicant or recipient during the two years before the application or renewal application, compliance review, or monitoring activity.

This information must include the:

- names of the parties;
- forum in which each case was filed; and
- relevant case numbers.

At the discretion of the CRC Director, recipients may be required to provide, in a timely manner:

- any information and data that the Director considers necessary to investigate complaints and conduct compliance reviews on bases prohibited under the nondiscrimination and equal opportunity provisions of WIOA and 29 CFR Part 38; and
- the particularized information and/or to submit the periodic reports that the CRC Director considers necessary to determine compliance with the nondiscrimination and equal opportunity provisions of WIOA or 29 CFR Part 38.

Where designation of individuals by race or ethnicity is required, the guidelines of the Office of Management and Budget must be used.

RECORDS RETENTION[22]

Each recipient must maintain the following records, whether they exist in electronic form (including email) or hard copy, for a period of not less than three years from the close of the applicable program year:

- records of applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment; and
- other records as are required under 29 CFR Part 38 or by the CRC Director.

Where a discrimination complaint has been filed or compliance review initiated, every recipient that possesses or maintains any type of hard-copy or electronic record related to the complaint (including records that have any relevance to the underlying allegations in the complaint, as well as records regarding actions taken on the complaint) or to the subject of the compliance review must preserve all records, regardless whether hard-copy or electronic, that may be relevant to a complaint investigation or compliance review, and maintain those records for a period of not less than three years from the date of final action related to resolution of the complaint or compliance review.

RECORDS ACCESS[23]

Each recipient must permit access by the CRC Director or the Director's designee during its hours of operation to its premises and to its employees and participants, to the extent that such individuals are on the premises during the course of the investigation, for the purpose of conducting complaint investigations, compliance reviews, or monitoring activities associated with a state's development and implementation of a nondiscrimination plan, and for inspecting and copying such books, records, accounts and other materials as may be pertinent to ascertain compliance with and ensure enforcement of the nondiscrimination and equal opportunity provisions of WIOA or 29 CFR Part 38.

Asserted considerations of privacy or confidentiality are not a basis for withholding information from CRC and will not bar CRC from evaluating or seeking to enforce compliance with the nondiscrimination and equal opportunity provisions of WIOA Sec. 188 and 29 CFR Part 38.

Whenever any information that the Director asks a recipient to provide is in the exclusive possession of another agency, institution, or person, and that agency, institution, or person fails or refuses to furnish the information upon request, the recipient must certify to CRC that it has made efforts to obtain the information and that the agency, institution, or

person has failed or refused to provide it. This certification must list the name and address of the agency, institution, or person that has possession of the information and the specific efforts the recipient made to obtain it.

Procedures

COMPLAINT FILING[24]

Any individual, or individual's representative, who believes that the individual or any specific class of individuals, has been or is being subjected to discrimination, harassment, or retaliation prohibited under WIOA Sec. 188 or 29 CFR Part 38 may file a written complaint. The complaint may be filed with the recipient's EO Officer or the Director, Civil Rights Center, U.S. Department of Labor, Room N4123, 200 Constitution Avenue, NW, Washington, DC 20210.

Generally, a complaint must be filed within 180 days of the alleged discrimination, harassment, or retaliation. However, for good cause shown, the CRC Director may extend the filing time. The time period for filing is for the administrative convenience of CRC, and does not create a defense for the respondent

Required contents

Each complaint must be filed in writing, either electronically or in hard copy, and must contain the following information:

- the complainant's name, mailing address, and, if available, email address (or another means of contacting the complainant);
- the identity of the respondent (the individual or entity that the complainant alleges is responsible for the discrimination);
- a description of the complainant's allegations, which must include enough detail to allow the CRC Director or the recipient, as applicable, to decide whether CRC or the recipient, as applicable, has jurisdiction over the complaint; the complaint was filed in time; and the complaint has apparent merit, in other words, whether the complainant's allegations, if true, would indicate noncompliance with any of the nondiscrimination and equal opportunity provisions of WIOA Sec. 188 or 29 CFR Part 38; and
- the written or electronic signature of the complainant or the written or electronic signature of the complainant's representative.

A complaint may be filed by completing and submitting CRC's Complaint Information Form and Privacy Act Consent, which may be obtained either from the recipient's EO Officer or from CRC. The forms are available electronically on CRC's website[25] and in hard copy via postal mail upon written request to Director, Civil Rights Center, U.S. Department of Labor, Room N4123, 200 Constitution Avenue, NW, Washington, DC 20210.

RIGHT TO REPRESENTATION

Both the complainant and the respondent have the right to be represented by an attorney or other individual of their choice.[26]

COMPLAINT PROCESSING PROCEDURES FOR RECIPIENTS[27]

The procedures that a recipient adopts and publishes for processing complaints permitted under WIOA Sec. 188 and 29 CFR Part 38 must state that the recipient will issue a written notice of final action on complaints within 90 calendar days of the date on which the complaint is filed. At a minimum, the procedures must include the following elements:

- initial, written notice to the complainant that contains the following information:
    - an acknowledgment that the recipient has received the complaint;
    - notice that the complainant has the right to be represented in the complaint process;
    - notice of rights contained in 29 CFR § 38.35; and
    - notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into the non-English languages as required in 29 CFR §§ 38.4(h) – (i), 38.34, and 38.36.
- a written statement of the issue(s), provided to the complainant, that includes the following information:
    - a list of the issues raised in the complaint; and
    - For each such issue, a statement whether the recipient will accept the issue for investigation or reject the issue, and the reasons for each rejection;
- a period for fact-finding or investigation of the circumstances underlying the complaint;

- a period during which the recipient attempts to resolve the complaint which must include alternative dispute resolution (ADR), as described in 29 CFR § 38.72(c);
- a written notice of final action, provided to the complainant within 90 calendar days of the date on which the complaint was filed, that contains the following information:
    - for each issue raised in the complaint, a statement of either:
        - the recipient's decision on the issue and an explanation of the reasons underlying the decision; or
        - a description of the way the parties resolved the issue; and
    - notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the notice of final action is received if the complainant is dissatisfied with the recipient's final action on the complaint.

ALTERNATIVE DISPUTE RESOLUTION (ADR)[28]

The recipient's ADR procedures must provide for the following.

- The complainant may attempt ADR at any time after the complainant has filed a written complaint with the recipient, but before a Notice of Final Action has been issued.
- The choice whether to use ADR or the customary process rests with the complainant.
- A party to any agreement reached under ADR may notify the CRC Director in the event the agreement is breached. In such circumstances, the following rules will apply.
    - The non-breaching party may notify with the CRC Director within 30 days of the date on which the non-breaching party learns of the alleged breach; and
    - The CRC Director must evaluate the circumstances to determine whether the agreement has been breached. If the Director determines that the agreement has been breached, the complaint will be reinstated and processed in accordance with the recipient's procedures.

If the parties do not reach an agreement under ADR, the complainant may file a complaint with the CRC Director as described in 29 CFR §§ 38.69 – 38.71.

COMPLAINT PROCESSING PROCEDURES FOR SERVICE PROVIDERS[29]

The Governor or the local area grant recipient (i.e., Chief Elected Official), as provided in the state's nondiscrimination plan, must develop and publish, on behalf of its service providers, the complaint processing procedures required in 29 CFR § 38.72. The service providers must then follow those procedures.

NOTICE OF RECIPIENT'S LACK OF JURISDICTION[30]

If a recipient determines that it does not have jurisdiction over a complaint, it must notify the complainant, in writing within five business days of making such determination. This notice of lack of jurisdiction must include:

- a statement of the reasons for that determination; and
- notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the complainant receives the notice.

NOTICE OF FINAL ACTION[31]

If the recipient issues a notice of final action before the 90 calendar day period ends, but the complainant is dissatisfied with the recipient's decision on the complaint, the complainant or the complainant's representative may file a complaint with the CRC Director within 30 days after the date on which the complainant receives the notice. If, by the end of 90 calendar days from the date on which the complainant filed the complaint, the recipient has failed to issue a notice of final action, the complainant or the complainant's representative may file a complaint with the CRC Director within 30 calendar days of the expiration of the 90 calendar day period. In other words, the complaint must be filed with the CRC Director within 120 calendar days of the date on which the complaint was filed with the recipient.

One-stop delivery system assessment and one-stop center certification policy

The state's policy on one-stop delivery system assessment and one-stop center certification establishes criteria and procedures for assessment of local one-stop delivery systems and one-stop centers and certification of one-stop centers.

Effectiveness

The local board's assessment of the effectiveness of the local one-stop delivery system and one-stop centers must include how well the system and centers:[32]

- integrate available services for job seekers and employers;
- meet the workforce development needs of job seekers and employment needs of local employers;
- operate in a cost-efficient manner;
- coordinate services among the one-stop partner programs; and
- provide access to one-stop partner program services to the maximum extent practicable, including providing services outside of regular business hours where there is a workforce need as identified by the local board.

In addition, the local board's assessment of the effectiveness of the local one-stop delivery system and one-stop centers must take into account feedback from one-stop customers.[33]

Physical and programmatic accessibility

The local board's assessment of the physical and programmatic accessibility of the local one-stop delivery system and one-stop centers must include how well the system and centers take actions to comply with the requirements established in WIOA Sec. 188 and its implementing rule, 29 CFR Part 38, regarding equal opportunity and non-discrimination. The actions must include:[34]

1. providing reasonable accommodations for persons with disabilities;
2. making reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination against persons with disabilities;
3. administering programs in the most appropriate integrated setting;
4. communicating with persons with disabilities as effectively as with others;
5. providing appropriate auxiliary aids and services, including assistive technology devices and services when necessary, to afford persons with disabilities an equal opportunity to participate in and enjoy the benefits of the program or activity;
6. providing physical accessibility for persons with disabilities; and
7. utilizing the common identifier (*American Job Center* or *a proud partner of the American Job Center network*) on all:[35]
    a. products, programs, activities, services, electronic resources, facilities, and related property and new materials used in the one-stop delivery system; and
    b. exterior branding, including signage.

All one-stop centers, including affiliate sites and specialized centers, must comply with the physical and programmatic accessibility requirements defined in described in this Section II(b), WIOA Sec. 188, and 29 CFR Part 38.[36]

Continuous improvement

The local board's assessment of the continuous improvement of the local one-stop delivery system and one-stop centers:[37]

- must include how well the system and centers support the achievement of the negotiated local levels of performance for the indicators described in WIOA Sec. 116(b)(2) and 20 CFR § 677.205; and
- may include other continuous improvement factors such as having:
    - a regular process for identifying and responding to technical assistance needs of the system and centers;
    - a regular system of continuing professional staff development; and
    - systems in place to capture and respond to specific customer feedback.

Local criteria[38]

A local board may establish additional assessment criteria or set higher standards for service coordination than those established in this policy. If additional criteria are established, the local board must review and update the criteria every two years as part of its regional and local plan development process.

Procedures

Methods for (a) assessment of the local one-stop delivery system and one-stop centers and (b) certification of one-stop centers must be established in writing by the local board prior to commencement of the assessment and certification process. In addition, the methods must be based on the criteria described above.

Each local board must notify the Nebraska Department of Labor (NDOL) of the outcomes of the assessments of the system and centers and certification of centers. The notification must be made by email submitted to ndol.wioa_policy@nebraska.gov and must:

- include a clear and descriptive written analysis of the system's and centers' compliance with the criteria established above; and
- identify all certified one-stop centers in the local area, including affiliate sites, and provide, for each center, the physical address, phone number, website address, and contact information for the one-stop operator.

Timelines

As of July 1, 2017, each local board must:

- assess its local one-stop delivery system and one-stop centers at least once every three years using the criteria and procedures described in above.
- certify at least one comprehensive one-stop center at least once every three years using the criteria, procedures, and methods described in above.

The notification described above must be submitted to NDOL no later than June 1 of the applicable year.

[1] For purposes of the policy, the term *recipient* means any entity that receives WIOA Title I funds either directly from the US Department of Labor or through the Governor or another recipient, including, but not limited to, local workforce development boards; one-stop operators; one-stop delivery system partners; Job Corps contractors and center operators, excluding the operators of Federally-operated Job Corps centers; Job Corps national training contractors; outreach and admissions agencies, including Job Corps contractors that perform these functions; placement agencies, including Job Corps contractors that perform these functions; and other national program recipients, including Native American program recipients; Migrant and Seasonal Farmworker Program recipients; and YouthBuild recipients; and other subrecipients, except for service providers. Individuals participating in WIOA Title I programs are not recipients.
[2] 29 CFR § 38.13(a)
[3] 29 CFR § 38.13(b)
[4] 29 CFR § 38.14(a)
[5] 29 CFR § 38.14(b)
[6] 29 CFR § 38.15(a). C*ompanion* means a family member, friend, or associate of an individual seeking access to an aid, benefit, service, training, program, or activity of a recipient, who, along with such individual, is an appropriate person with whom the recipient should communicate [29 CFR § 38.15(a)(ii)].
[7] 29 CFR §§ 38.25 and 38.26
[8] 29 CFR § 38.34
[9] 29 CFR § 38.36
[10] 29 CFR § 38.9
[11] 29 CFR § 38.38(a)
[12] 29 CFR § 38.38(b)
[13] 29 CFR § 38.36
[14] 29 CFR §§ 38.9, 38.15, and 38.39
[15] 29 CFR § 38.40
[16] 29 CFR § 38.41
[17] 29 CFR 38.41(c)
[18] 29 CFR § 38.42(a)
[19] 29 CFR § 38.42(b)
[20] 29 CFR § 38.63
[21] 29 CFR § 38.65
[22] 29 CFR § 38.43
[23] 29 CFR § 38.44
[24] 29 CFR § 38.69

[25] The Complaint Information Form and Privacy Act Consent Form are accessible at https://www.dol.gov/oasam/programs/crc/external-enforc-complaints.htm.
[26] 29 CFR § 38.71
[27] 29 CFR § 68.72
[28] 29 CFR § 38.72(c)
[29] 29 CFR § 38.73
[30] 29 CFR § 38.74
[31] 29 CFR §§ 38.75 and 38.76
[32] 20 CFR § 678.800(b)
[33] 20 CFR § 678.800(b)
[34] 20 CFR §§ 678.800(b)(1) – (6) and 678.900
[35] Local boards, local areas, and one-stop partners may use additional (not alternative) identifiers on or for their facilities and related property, products, programs, activities, services, and materials [20 CFR § 678.900(d)].
[36] 20 CFR § 678.800(e)
[37] 20 CFR § 678.800(c)
[38] 20 CFR § 678.800(d); TEGL 16-16

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

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

In addition to the state's Nondiscrimination Plan and policy on nondiscrimination and equal opportunity, which are described above in section 9, Nebraska has established a Limited English Proficiency (LEP) Plan. The LEP Plan insures that individuals with limited English proficiency are able to access programs and services provided through the one-stop delivery system on an equitable basis. Key features of the LEP Plan include:

- establishment of an LEP planning committee to provide guidance and leadership around the equitable provision of services to individuals with limited English proficiency;
- thorough assessment of the language needs of the populations served by attempting to identify LEP individuals;
- availability of specific resources at one-stop centers, include bilingual staff, LanguageLine or International Communications translation services, referral to ESL resources and the availability of materials in Spanish; and
- training staff on serving individuals with LEP needs.

The current LEP plan is accessible on NDOL's Manuals, Plans, and Reports webpage (https://dol.nebraska.gov/EmploymentAndTraining/LCRWP/WIOA/ManualsPlansReports).

The Nebraska Department of Labor (NDOL) public website (dol.nebraska.gov) provides information for workers and employers, including information about job searching, training, the Workforce Innovation and Opportunity Act, and many additional programs and services. The website includes an option for translation services provided via Google Language Tools. The translation through Google utilizes an automated translation process that provides an approximation of the site's original content. NDOL provides a Translation Disclaimer Statement on the website, indicating the possibility of potential issues with the automated translation process. Languages available through the automated translation process include Spanish, Chinese, French, German, Italian, Korean, Russian, Polish, Arabic, Portuguese, Japanese, and Norwegian. The website provides information on how to contact local field staff for additional assistance. In addition, NEworks, which includes the state's labor-exchange system, is available in Spanish.

English-as-a-second Language (ESL) instruction is available throughout the state to provide populations with low levels of English literacy with the instruction they need to improve fluency. Referral to providers of ESL education and the provision of transportation and other forms of assistance necessary to access these courses will continue to occur through one-stop centers.

IV. Coordination with State Plan Programs

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

As described in Section II.a.2.B., the Nebraska Workforce Development Board (Board) hosted the *Strategy Workshop: 2020 – 2024 State Plan for Nebraska's Workforce System*, on behalf of Governor Pete Ricketts and the state plan partners. The purpose of the workshop was to obtain input from the shareholders of Nebraska's workforce system. That input was used by the plan partners as they developed this plan during a two-day plan-development workshop hosted by the Board's Policy and Oversight Subcommittee and attended by:

- representatives from plan partner programs;
- representatives from all local workforce development boards; and
- representatives of other workforce system partners, including the Nebraska Department of Economic Development and the Nebraska Department of Health and Human Services.

Ongoing joint planning and coordination among the plan partner programs, required one-stop partner programs, and other workforce system programs occurs through the Nebraska Partner Council. The Council meets on a regular basis for the purposes described in Section II.c.1. In addition, members of the Council service on the Board's three subcommittees as described in Section II.c.1.

V. Common Assurances (For All Core Programs)

The Unified or Combined State Plan must include assurances that:

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 administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; *(b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;*	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes

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

VI. Program-Specific Requirements for Core Programs

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

Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B

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

a. *General Requirements*

1. Regions and Local Workforce Development Areas

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

Nebraska's regional structure includes three regions.

1. Metro Region covers Cass, Dodge, Douglas, Sarpy, Saunders, and Washington Counties, with Douglas County being the target area of economic concentration.
2. Southeast Region covers Fillmore, Gage, Jefferson, Johnson, Lancaster, Nemaha, Otoe, Pawnee, Richardson, Saline, Seward, Thayer, and York Counties, with Lancaster County being the target area of economic concentration.
3. Greater Nebraska Region covers the remaining 74 counties in Nebraska, with the following eight counties being target areas of economic concentration: Scotts Bluff County; Cheyenne County; Lincoln County; Red Willow County; Holt County; Madison County; Platte County; and Buffalo, Hall, and Adams Counties as a collective target area.

Nebraska's Governor has designated three local areas:

1. Greater Omaha Local Workforce Development Area, serving Douglas, Sarpy, and Washington counties;
2. Greater Lincoln Local Workforce Development Area, serving Lancaster and Saunders counties; and
3. Greater Nebraska Local Workforce Development Area, serving the remaining 88 Nebraska counties.

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

Local area designation

Initial designation

If a local board and CEO request initial designation for a local area, the request must be approved if the local area, for the two program years preceding the date of enactment of WIOA (Program Years 2012 and 2013):

- was designated as a local area under WIA;
- performed successfully; and
- sustained fiscal integrity.

Subsequent designation

If a local board and CEO request subsequent designation for a local area, the request must be approved if the local area, for the two most recent program years of initial designation:

- performed successfully; and
- sustained fiscal integrity.

In addition, if the local area is part of a planning region, the local board and CEO must have participated in a regional planning process that resulted in the following activities:

- preparation of a regional plan;
- establishment of regional service strategies, including use of service delivery agreements;
- development and implementation of sector initiatives for in-demand industry sectors or occupations for the region;
- collection and analysis of regional labor market data in conjunction with the state;
- establishment of administrative cost arrangements for the region, including pooling of funds for administrative costs;
- coordination of transportation and other supportive services for the region, as appropriate;
- coordination of activities with regional economic development providers; and
- establishment of an agreement concerning how the planning region will:
    - collectively negotiate and reach agreement with NDOL on local levels of performance; and
    - report on the performance accountability measures described in WIOA Sec. 116(c) for the local areas or the planning region.

Performed successfully and sustained fiscal integrity

Under the state's current policy on local workforce development areas, procedures for determining whether a local area met criteria for *performed successfully* and *sustained fiscal integrity* are consistent with WIOA Sec. 106(b)(2) and (3) and 20 CFR § 679.260(a) and (b).

Performed successfully. The standard of *performed successfully* means the local area met or exceeded negotiated levels of performance for the two most recently completed program years for the following performance indicators: [1]

- employment rate second quarter after program exit;
- employment rate fourth quarter after program exit;
- median earnings second quarter after program exit;
- credential attainment rate; and
- measurable skills gains rate.

The local area has met or exceeded negotiated levels of performance when the overall local program score or overall local indicator score is 90 percent or higher for the program year.

Sustained fiscal integrity. The standard of *sustained fiscal integrity* means the Secretary of the US Department of Labor has not made a formal determination that either the grant recipient or administrative entity for the local area, for the two-year period preceding the date of a request for designation as a local area, misexpended funds due to:[2]

- willful disregard of the requirements of applicable regulations;
- gross negligence; or
- failure to comply with accepted standards of administration.

Procedures

General procedural requirements for initial and subsequent designation and redesignation of local areas include:[3]

- consultation with the state board;
- consultation with local boards and CEOs; and
- consideration of comments received through a public comment process observed by NDOL, which must:
    - offer adequate time for public comment prior to designation or redesignation of local areas; and
    - provide an opportunity for comment by representatives of local boards, CEOs, businesses, institutions of higher education, labor organizations, other local area stakeholders, and the public regarding designation or redesignation of local areas.

Procedures for requesting designation as a local area are provided through an Employment and Training Notice issued by NDOL.

Redesignation

Local boards and CEOs within a planning region may make a joint written request for redesignation of their respective local areas as a single local area. If the Governor approves the request, the state board must authorize use of WIOA Title I statewide funds to facilitate redesignation activities. Activities that may be carried out by local areas approved for redesignation include:

- convening sessions and conferences on the topic of redesignation;
- renegotiating contracts and agreements impacted by redesignation; and
- other activities directly associated with redesignation deemed appropriate by the state board.

If statewide funds are not available, funds for redesignation activities may be provided in the next program year.

Planning region identification

At the request of the Governor, NDOL evaluated labor market structure and distribution, designated economic development areas, distribution of educational and training resources, location of population centers, workforce commuting patterns, labor force conditions, and geographic boundaries. The outcome of NDOL's evaluation revealed a substantive relationship between concentrations of economic activity and statewide workforce commuting patterns. Following the evaluation, NDOL consulted with the following groups and individuals regarding identification of planning regions:

- Nebraska Workforce Development Board in October 2015;
- CEOs and local area boards in July and August 2015; and
- core partners in July and August 2015.

NDOL provided the groups and individuals with a summary of the evaluation for review and comment as part of the consultations. NDOL also held focus groups during the months of July and August 2015. NDOL met with over 250 workforce system representatives from across Nebraska. The focus groups were held at three Nebraska locations: Lincoln, Grand Island, and Omaha. The focus group discussions were co-sponsored by the core partners. Focus group topics included the identification of planning regions to promote regional alignment with the labor market and economic development activities through:

- identification of key elements of an economic region;
- examination of the usefulness of defining economic regions based on commuting patterns; and
- establishing factors the Governor should consider when identifying planning regions.

Subsequent to the consultations and focus groups, the Nebraska Workforce Development Board, CEOs, and local boards recommended establishing planning regions based on the relationship between areas of economic concentration and workforce commuting patterns. On August 30, 2016, the Governor established an in-state structure that includes three planning regions based on this recommendation.

[1] 20 CFR § 679.260(b)(2)
[2] 20 CFR § 679.260(c)
[3] 20 CFR § 679.230

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

Appeal process

A local board and CEO may appeal a denied request for designation as a local area. The appeal must be made first to the state board. If a decision on the appeal is not rendered within a reasonable amount of time *or* if the appeal does not result in designation, the local board and CEO may request review by the Secretary of the US Department of Labor.

Appeal to the Nebraska Workforce Development Board

The local board and CEO must submit a written request for a hearing to the chair of the state board within 15 calendar days of the date of notification of denial of the request for designation. The written request must include a description of the basis for the appeal and be submitted by certified mail, return receipt requested, to: Chair, Nebraska Workforce Development Board, Attention: State WIOA Team, Office of Employment and Training, Nebraska Department of Labor, 550 South 16th Street, Lincoln, NE 68508.

A copy of the appeal must be submitted by email to NDOL at ndol.wioa_policy@nebraska.gov.

Absent extenuating circumstances, the chair will assign a hearing officer and a hearing will take place within 15 calendar days of the chair's receipt of the written request for a hearing. The hearing will include:

- a statement of the reason(s) for denial of the request for designation; and
- an appeal by the local board and CEO describing why the decision should be reversed or a compromise established.

The chair will render a decision within 15 calendar days of the date of the hearing.

Appeal to the Secretary of Labor

If a decision on the appeal is not rendered by the state board within a reasonable amount of time or if the appeal does not result in designation, the local board and CEO may request review by the Secretary of the US Department of Labor. When appealing to the Secretary, the local board and CEO must file the appeal no later than 30 calendar days after receipt of written notification of denial from the state board. In its appeal to the Secretary, the local board and CEO must establish that:

- procedural rights under the appeal process set forth in this policy were not afforded; or
- the local area meets the requirements for local area designation provided under WIOA Sec. 106(b)(2) or 106(b)(3) and 20 CFR § 679.250.

The appeal to the Secretary must be submitted by certified mail, return receipt requested, to: Secretary, US Department of Labor, 200 Constitution Avenue NW, Washington, DC 20210, Attention: ASET.

In addition, a copy of the appeal to the Secretary must be submitted simultaneously by certified mail, return receipt requested, to: Chair, Nebraska Workforce Development Board, Attention: State WIOA Team, Office of Employment and Training, Nebraska Department of Labor, 550 South 16th Street, Lincoln, NE 68508. A copy of the appeal to the Secretary must also be submitted by email to NDOL at ndol.wioa_policy@nebraska.gov.

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

Appeal process

Under the state funding mechanism, a required one-stop partner may appeal the determination of its required contribution to funding of infrastructure costs. The appeal may be made based on a claim that the determination is inconsistent with the requirements and limitations established under 20 CFR § 678.738 or the principles of proportionate share and relative benefit.

To appeal a determination of its contribution to funding of infrastructure costs, a required one-stop partner must:

- submit the appeal in writing within 15 days of NDOL's notification to the partner regarding its required contribution; and
- provide the following information with the written appeal:
  - description of the partner's basis for appeal; and
  - rationale for reversing the determination or establishing a compromise.

The written appeal, including supporting documentation, must be submitted to: Commissioner of Labor, Nebraska Department of Labor, PO Box 94600, Lincoln, NE 68509-4600.

In addition, copy of the appeal and supporting documentation must be sent simultaneously by email to:

- the chair of the local board and CEO;
- all other required one-stop partners operating in the local area;
- Mary Anne Bradfield, Deputy Commissioner for Reemployment Services, Nebraska Department of Labor at maryanne.bradfield@nebraska.gov; and
- WIOA policy mailbox at ndol.wioa_policy@nebraska.gov.

Absent extenuating circumstances, the NDOL Commissioner will assign a hearing officer and a hearing will take place and a determination made within 30 days of the receipt of the written appeal and supporting documentation. The hearing will include a:

- statement of the reason for the determination of the required one-stop partner's required contribution;
- statement by the partner, describing why the decision should be reversed or a compromise established; and
- final judgment that will include an explanation of the reasons for retention or reversal of the determination or establishment of a compromise.

2. ***Statewide Activities***

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

Policies and guidance

The state's current policies are listed in Table 35, with descriptions of primary topics covered in the policies.[1]

Table 35. WIOA policies

Category	Title	Topics
Governance	Workforce Development Boards and Chief Elected Officials	State board membership, functions, and conflict of interest requirements; local board membership, functions, conflict of interest requirements, certification criteria and procedures, and decertification criteria and procedures; CEO functions and conflict of interest requirements
Governance	Local Areas and Planning Regions	Local area designation, redesignation, and appeal procedures regarding denial of designation; requirements for identification of planning regions
Governance	Regional and Local Plans, Change 4	Requirements for development of regional and local plans, including required planning activities and content, public comment and accessibility requirements, and technical assistance requirements; criteria for modification and revision

Category	Title	Topics
		of regional and local plans; submission procedures for regional and local plans; approval process for regional and local plans
Governance	Memorandums of Understanding and Funding Agreements, Change 1	Purpose, scope, and development of MOUs and funding agreements; reporting outcomes of negotiations on MOUs and funding agreements; state funding mechanism appeal process for required one-stop partners
One-stop Delivery System	One-stop Delivery System Assessment and One-stop Center Certification, Change 1	Requirements for one-stop delivery system assessment and one-stop center certification
One-stop Delivery System	One-stop Operator Competitive Selection	Competitive selection requirements; eligible entities; one-stop operator responsibilities and prohibited functions; the Uniform Guidance and procurement standards; essential contract elements; monitoring of one-stop operators
One-stop Delivery System	Priority Populations and Priority of Service	Priority of service; priority requirements for use of Title I, Title III, and JVSG funds; local area compliance and monitoring of priority of service
Performance Accountability	Performance Accountability, Change 1	Performance accountability requirements applicable to Title I youth, adult, and dislocated worker programs, Title III Wagner-Peyser Employment Service, Jobs for Veterans State Grant program, Trade Adjustment Assistance program, and National Dislocated Worker Grant programs; primary indicators of performance; categories of enrollment and exit; incumbent worker training and performance accountability; administrative requirements of performance accountability; corrective action and sanctions
Administrative Requirements	Youth, Adult, and Dislocated Worker Program Funding, Change 1	Formulas for determining state allotments and local area allocations; funding distribution and availability; return and reallocation of unexpended local area allocations; recapture and reallocation of unobligated local area allocations; recapture and reallotment of unobligated state allotments
Administrative Requirements	Procurement	Administrative requirements for procurement of goods and services; procurement standards and methods
Administrative Requirements	Records Management, Change 1	Records management requirements for Title I youth, adult, and dislocated worker programs; Title III Wagner-Peyser Employment Service; Jobs for Veterans State Grant program; Trade Adjustment Assistance program; and discretionary grant programs; requirements regarding records management systems, electronic case files, records correction, records retention, and access
Administrative Requirements	Quarterly Reporting and the Financial Request and Reporting System, Change 2	Financial reporting requirements; requesting Title I disbursements; corrective action, sanctions, and repayment; appeals and administrative hearings
Administrative Requirements	Nondiscrimination and Equal Opportunity, Change 2	Obligation to ensure nondiscrimination and equal opportunity; requirements and procedures; consequences regarding noncompliance
Administrative Requirements	Grievances and Complaints - WIOA Title I	Noncriminal grievance and complaint requirements and procedures, including state and Federal appeal procedures; criminal complaint requirements and procedures
Youth, Adult, and Dislocated Worker	Program Eligibility for Youth, Adults, and Dislocated Workers, Change 2	General eligibility requirements; specific eligibility requirements for youth, adult, and dislocated worker programs; nondiscrimination

Category	Title	Topics
Youth, Adult, and Dislocated Worker	Youth Program, Change 1	Program design; service provider selection and procurement, including consumer choice requirements and youth service provider lists; pay-for-performance contract strategies and contracts; community involvement, framework, and expenditures; program services [elements], including occupational skills training and follow-up services
Youth, Adult, and Dislocated Worker	Adult and Dislocated Worker Programs	Requirements regarding career services, training services, supportive services, co-enrollment and coordination of services, and privacy
Youth, Adult, and Dislocated Worker	Eligible Training Providers	Eligibility criteria and process; denial or termination of eligibility; program performance reports; individual training accounts; roles and responsibilities of the state and local boards
Youth, Adult, and Dislocated Worker	On-the-job Training, Change 2	On-the-job (OJT) requirements; use of funds for OJT; appeal and grievance procedures
Youth, Adult, and Dislocated Worker	Work-based Training	Work-based training services for adults, dislocated workers, employers; Registered Apprenticeship programs; prohibited activities
Rapid Response	Rapid Response Services	Purpose and types of Rapid Response services; circumstances requiring Rapid Response services; roles and responsibilities of staff involved in the delivery of Rapid Response services
Trade Adjustment Assistance (TAA)	Trade Adjustment Assistance Program, Change 1	Applicable program directives and guidance; co-enrollment of TAA-certified workers; expenditure limitations for training services

The state's policies are based on the state's reading of the applicable statutes, regulations, rules, and guidance released by the US Government and the State of Nebraska and are subject to change as revised or additional statutes, regulations, rules and guidance are issued.

[1] The state's current policies are accessible at https://dol.nebraska.gov/EmploymentAndTraining/LCRWP/WIOA/Policies.

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

Nebraska will utilize Governor's set-aside funding for delivering Rapid Response services to businesses and employees experiencing a dislocation event to maximize quickly public and private resources and to minimize the disruptions on companies, affected workers, and communities. Rapid Response activities are coordinated by the Nebraska Department of Labor's (NDOL) state-level Rapid Response team and are delivered at the local-area level by workforce and community partners. The Rapid Response team of workforce professionals includes:

- Unemployment Insurance representatives;
- Trade Adjustment Assistance representatives;
- Wagner-Peyser Employment Service representatives;
- WIOA Title I programs representatives; and
- other community partners including healthcare, financial planning, and community assistance.

Other partners that NDOL collaborates with include:

- local boards and chief elected officials;
- economic development organizations;
- educational institutions; and
- local community organizations.

Local Rapid Response team members provide customized activities onsite at an affected company or alternate location, to assist companies and workers through the transitions associated with job loss.

Rapid Response activities are provided for any dislocation, regardless of company size and number laid off. An onsite response will be offered to all companies facing a downsizing or closing and on-site responses will be tailored to the needs and schedules of the affected employees.

The topics presented at Rapid Response events regularly include:

- American Job Center resources;
- Title I adult and dislocated worker program services;
- Unemployment Insurance benefits;
- Trade Adjustment Assistance (if Trade certified);
- employment services;
- labor market information;
- financial counseling programs;
- resume and interview guidance;
- Veterans program assistance;
- local health and human services programs; and
- health insurance options.

Rapid Response events are used to connect directly with affected workers to the workforce system and follow-up outreach is conducted for additional partner program service referrals. A questionnaire is distributed at each event and used to identify dislocated workers' needs and interests for future workforce services. Rapid Response survey data will also be used with the submission of a Dislocated Worker Grant in situations that warrant additional funding to address increased need for employment and training services.

In addition to assisting employers who are in the final stages of closing or laying off individuals, Nebraska also provides layoff aversion services to assist employers who are in the early stages of laying off or closing. Identification of these situations comes from partnerships with economic development, chambers of commerce, industry associations, and local area business service representatives of the core partner programs. Employers will be provided information related to opportunities to receive assistance with skills upgrade and incumbent worker training, customized training, English-as-a-Second-Language (ESL) classes, and basic skills training.

The Rapid Response team will closely collaborate with and leverage existing relationships between employers and business service representatives to identify opportunities for layoff aversion assistance. A successful layoff-aversion strategy will incorporate the utilization of funds from multiple sources including grants from Nebraska's Worker Training Program, WIOA Title I programs, Dislocated Worker Grants, and core partner programs.

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

In response to a layoff or closure as the result of a natural disaster, the Rapid Response team will quickly organize an event in coordination with FEMA and NEMA representatives:

- FEMA: Region VII contact is 816-283-7061 or FEMARegion7info@fema.dhs.gov.
- NEMA: Emergency Management Program Specialist at 402-471-7426.

Essential planning topics will address:

- whether an individual assistance declaration has been requested/approved;
- whether a Disaster Recovery Center (DRC) is available in the area;
- what services will be available to workers through FEMA; and
- logistics of internet availability, space, capacity limitations, and related issues.

The Rapid Response team will also closely coordinate with Unemployment Insurance, especially in the event of a Presidential declaration for Disaster Unemployment Assistance (DUA).

Options for meeting places across the state will depend on the type and severity of the natural disaster along with the location of the affected workers. If the President issues an Individual Assistance (IA) declaration, FEMA will open

Disaster Recovery Centers (DRCs), which may be used for Rapid Response events and used as Red Cross Stations and community centers.

A Rapid Response event for a natural disaster will include more than the traditional mandated partners in order to coordinate and inform local and national disaster relief efforts. Information will be exchanged with agencies and contacts that can meet the needs of the impacted individuals, based on the type and severity of the natural disaster, including emergency housing and clothing and nutritional needs. The list of invited additional partners may include, but would not be limited to:

- Federal Emergency Management Agency (FEMA);
- Nebraska Emergency Management Agency (NEMA);
- Red Cross;
- faith-based organizations; and
- community-based organizations.

The Rapid Response team will play a key role in recommending the request of disaster Dislocated Worker Grant funding if it is determined that there is an opportunity to support clean-up and recovery efforts in the impacted area.

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

Nebraska provides early intervention services, such as Rapid Response services, to all worker groups, including workers identified in a TAA petition filing, when notified of a possible layoff or closure. All layoffs and closures identified by the Rapid Response team are investigated by the state TAA Program Coordinator to determine if conditions indicate that a TAA petition should be filed on behalf of the workers. A Trade petition is filed if research demonstrates that foreign trade may have contributed to the downsizing or closure. Once a petition is certified, a Rapid Response event is hosted and content specific to the identified Trade-affected workers is presented, including information relating to TAA and TRA benefits. Additional agenda topics include an orientation to Nebraska's one-stop delivery system and services available from partner programs including WIOA Title I dislocated worker programs and the Wagner-Peyser Employment Service.

Rapid Response activities related to the TAA program must include:

- provision of information and access to unemployment compensation benefits and programs, such as short-term compensation, comprehensive one-stop system services, and employment and training activities, and information on the TAA program; and
- delivery of services to worker groups for which a TAA petition has been filed.

Upon receipt of a certified TAA petition, a notice will be sent from the state TAA Program Coordinator to all eligible workers to notify them of their TAA eligibility. A public notice is also published in the local-area newspaper, and social media is utilized to increase visibility of the notice. The mailed notifications contain information on TAA program benefits along with details of the related Rapid Response event; including location, date, time, and contact information for the local TAA program representative. Follow-up outreach is conducted to members of the eligible worker group who do not attend the Rapid Response event, offering an individualized orientation of TAA benefits.

b. Adult and Dislocated Workers Program Requirements

1. Work-Based Training Models

If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

Work-based training in Nebraska's one-stop delivery system is locally driven with education as a supporting component. Work-based training activities provide access to training services aligned with in-demand industry sectors and occupations, including occupational skills training, on-the-job training, incumbent worker training, internships, and Registered Apprenticeships that ensure quality training for employers and participants. Work-based training models are also discussed elsewhere in earlier sections of the plan.

In April 2016, the Nebraska State Legislature passed the Sector Partnership Program Act (Neb. Rev. Stat. §§ 48-3401 - 48-3407). The purpose of the Act is to support local sector partnerships that will close skill gaps in high-demand sectors of business and industry. By conducting labor availability and skills gap studies, the Sector Partnership Program will identify work-based training opportunities to ensure that the state's workforce and economic development activities align with the needs of employers in the state's key industries.

2. *Registered Apprenticeship*

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

Service design to support employers and Registered Apprenticeship sponsors

The Nebraska Department of Labor (NDOL) adopted a holistic approach to working with employers in order to identify the most practical workforce solutions. All NDOL business service representatives are trained to discuss Registered Apprenticeship with employers, answer questions, and identify employers best suited for implementing a program. Additionally, representatives from the Nebraska Department of Economic Development have been trained to support businesses as well. Businesses requesting assistance with program development and sponsors of Registered Apprenticeship programs requiring technical assistance are referred to the NDOL Registered Apprenticeship Program Coordinator.

When a business decides to build a Registered Apprenticeship program, a one-on-one consultation is scheduled to discuss program objectives. The NDOL Program Coordinator is responsible for coordinating these efforts. NDOL serves as an organizer between local educational institutions, sponsoring employers, and the US Department of Labor Office of Apprenticeship in order to bring the appropriate parties together for program development. The NDOL Program Coordinator assists with building new programs, revision of established programs, and submission to the Office of Apprenticeship.

Once a program is approved, NDOL staff provides sponsors with the following technical assistance strategies:

- delivering guidance regarding best practices for Registered Apprenticeship program implementation;
- coordinating and facilitating apprentice-recruiting events at American Job Centers for participating employers;
- organizing signing ceremonies for new program promotion and apprentice recruitment, including the signing of new apprentices into established programs;
- providing guidance on Registered Apprenticeship regulations and serving as a liaison or first point of contact for employers and the US Department of Labor Office of Apprenticeship; and
- connecting sponsors with one-stop delivery system programs in order to encourage recruitment of underserved populations, adult and dislocated workers, and Veteran services, including the provision of guidance and promotional material regarding the automatic inclusion Registered Apprenticeship sponsors on the Eligible Training Provider List and instructions on how to request inclusion on the list.

NDOL, in partnership with the US Department of Labor Office of Apprenticeship, engages in strategies for mentor support and training that encourages self-sustainability and self-efficacy. Traditionally, strong programs have well-developed mentoring programs that are employer driven. NDOL executes two primary approaches for providing support/training assistance to mentors: consultation and connection to educational institutions for support.

1. NDOL delivers consultation services as a standard practice when programs are in development. This includes connections to established programs willing to serve as employer peer-to-peer mentors in alike industries. This peer-to-peer exchange enables businesses to gain best-practice knowledge from others within the same industry. NDOL is encouraging this peer-to-peer approach between high schools participating in youth Registered Apprenticeship programs. Peer-to-peer engagement enables high schools to align established career and technical education practices with the Registered Apprenticeship system. In addition, NDOL supports employers by offering guidance for best practices and creating a strong mentorship programs. All programs are built through one-on-one consultation, which includes the creation of mentorships

within each company. NDOL includes the US Department of Labor Office of Apprenticeship as necessary to ensure that employers are compliant with regulations relating to mentorship.

2. The second approach to serving program mentors is engaging local community colleges and industry associations to provide resources and education for program mentors. NDOL continues to build relationships with the local educational system in order to provide customized training for mentors, which may include project management and leadership education.

Service design to support recruitment of apprentices

In order to encourage recruitment of apprentices, including individuals from underrepresented populations, NDOL is utilizing two strategies.

1. First, NDOL promotes Registered Apprenticeship with community organizations and workforce partners. NDOL partner organizations are encouraged to refer job seekers to the NDOL Registered Apprenticeship team for assistance. Currently, NDOL has two Workforce Coordinators located in eastern and western areas of Nebraska that can assist with directing job seekers to apprenticeship opportunities. Both Workforce Coordinators coordinate their Registered Apprenticeship responsibilities with their responsibilities to implement other reemployment programs. This results in integration of Registered Apprenticeship with the state's other reemployment programs. These Workforce Coordinator staffing positions are connected to the Apprenticeship Expansion Grant and will be a part of this state plan until June 30, 2022. At the conclusion of the grant, NDOL will assess statewide staffing needs and methods for continued support of Registered Apprenticeship.
2. Second, Registered Apprenticeship program sponsors are invited to job fairs at local American Job Centers to promote Registered Apprenticeship and recruit apprentices. Currently, NDOL assists any Registered Apprenticeship program that uses American Job Centers across the state for applying and submission of minimum requirements. NDOL is currently working with other sponsoring programs to offer this service as well.

NDOL will continue developing key partnerships with the purpose of engaging job seekers and underrepresented populations. The NDOL Registered Apprenticeship Program Coordinator provides outreach by making presentations and providing promotional materials, so community organizations can seamlessly find Registered Apprenticeship information as needed. Additionally, NDOL is planning for a Registered Apprenticeship group to meet quarterly that will include employers, community organizations, and other workforce partners for generating a more cohesive system.

3. *Training Provider Eligibility Procedure*

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

The State's eligibility criteria, information requirements, and procedures for determining initial and continued eligibility for "traditional" training providers and Registered Apprenticeship programs are defined under the State's current Eligible Training Providers policy, which is accessible at https://dol.nebraska.gov/webdocs/getfile/05525583-7df7-4b56-aa07-f0886ce6bafd. The State recently published a change to the current policy for public comment. The draft Eligible Training Providers, Change 1 policy is accessible at https://dol.nebraska.gov/webdocs/getfile/84b40753-b46e-44d9-92f7-c5c0d95d9f9b. The proposed modifications to the current policy include changes relating to:

- eligibility requirements relating to the physical and programmatic accessibility of programs for individuals who are employed and individuals with barriers to employment, including individuals with disabilities;
- addition of provisions defining the program performance indicators that apply to training provider programs;
- references to Registered Apprenticeship programs throughout the policy, which now also refer to National Registered Apprenticeship programs;
- automatic eligibility of National Registered Apprenticeship programs, exceptions relating to Registered Apprenticeship and National Registered Apprenticeship programs, costs associated with related technical instruction, and technical assistance for sponsors of Registered Apprenticeship and National Registered Apprenticeship programs; and
- clarification that sponsors of Registered Apprenticeship and National Registered Apprenticeship programs are not subject to program performance reporting requirements in relation to denial or termination of eligibility.

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

Priority of service

The state's current policy on priority of service requires local WIOA Title I adult programs give priority[1] for career services, training, and employment services to Veterans, eligible spouses of Veterans, and non-Veterans who are:

- recipients of public assistance;
- other low-income individuals; or
- individuals who are basic-skills deficient.

Services to eligible adult program participants must be provided in the following order:[2]

- first, to Veterans and eligible spouses of Veterans who are recipients of public assistance, low-income, or basic-skills deficient;
- second, to individuals who are not Veterans and eligible spouses of Veterans but are recipients of public assistance, low- income, or basic-skills deficient;
- third, to Veterans and eligible spouses of Veterans who are not recipients of public assistance, low- income, or basic-skills deficient; and
- last, to persons who are not recipients of public assistance, low- income, or basic-skills deficient.

The state's policy also requires that local boards establish policies that address priority populations and priority of service.[3] The policies must, at a minimum:

- describe how the local board and one-stop center staff will perform outreach to the priority population groups to ensure that the groups are aware of their entitlement to priority of service;
- describe how individuals from the priority population groups are: identified at the point of entry into the local workforce delivery system, including one-stops, to ensure the provision of timely and useful information on priority of service, including individuals who: physically access service delivery points and access service delivery through technology; given an opportunity to take full advantage of priority of service;
- be clear on the process or steps the local board and one-stop partner staff must take to ensure priority of service for individuals from the priority population groups; and
- describe the review and analysis process the local board will conduct to ensure priority of service.

In addition, the state's policy states that local boards:

- ensure local plans address the requirements of the state's policy on priority populations and priority of service;
- should maintain local priority of service policies at all workforce service delivery points; and
- should make local priority of service policies easily accessible to the public (posted on the website, identified in published materials, etc.).

Monitoring priority of service

Compliance with the priority requirements of the state's priority of service policy must be monitored by each local board or its designated local area monitor in accordance with its local area policy on monitoring. Monitoring must include a review of the processes set forth in the local area policy on priority of service. Local area compliance will be reviewed as part of routine program monitoring conducted by Nebraska's WIOA State Monitor.

[1] WIOA Sec. 134(c)(3)(E)
[2] TEGL 10-09; VPL 07-09
[3] TEGL 10-09; VPL 07-09

5. *Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs*

The state's criteria regarding transfer of funds between local area adult and dislocated worker programs are established under the state's policy on program funding. The policy states that a local board may transfer up to 100 percent of a program year allocation for its adult program and dislocated worker program between the two programs.[1] The local board must obtain written approval from the Nebraska Department of Labor (NDOL) before the transfer can be made.[2]

Criteria and factors

In its evaluation of a transfer request, NDOL may take into account the following criteria and factors:[3]

- employment and service needs of the local area (both job seekers and employers);
- current labor market information and demographics;
- consistency with broader strategies in the local plan;
- whether the local area is meeting negotiated levels of performance;
- that career and training services must continue to be made available to both adults and dislocated workers;
- availability of funds to support the transfer; and
- any other considerations NDOL considers necessary to determine the appropriateness of the transfer.

Any transfer request that is incomplete or conflicts with Federal, state, or local laws, rules, regulations, guidance, or policies will not be approved.

Submission of requests

A local board must submit a written request to transfer funds using a transfer request form.[4] The request form must be submitted to the WIOA policy mailbox at ndol.wioa_policy@nebraska.gov and Kim Schreiner, Controller, at kim.schreiner@nebraska.gov.

Determination on requests

Absent extenuating circumstances, a determination on a transfer request will be made in writing within 60 calendar days of NDOL's receipt of a fully completed transfer request form.

[1] 20 CFR § 683.130(a). Transfer of youth program funds to an adult or dislocated worker program is not permitted [20 CFR § 683.130(b)].
[2] 20 CFR § 681.130(c)
[3] TEGL 19-16
[4] The form is available by request to ndol.wioa_policy@nebraska.gov.

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

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 contract: [11] SEC. 102(B)(2)(D)(I)(V)*

Youth service provider selection and procurement

The State has established criteria to be used by local boards in awarding grants or contacts for youth workforce investment activities. This criteria is provided under two policies, the current Youth Program, Change 1 policy (accessible at https://dol.nebraska.gov/webdocs/getfile/fcdffa41-59b3-4734-9e21-611a11726876) and the current Procurement policy (accessible at https://dol.nebraska.gov/webdocs/getfile/74033c46-a0f6-4794-b072-d9f0b23c0096).

Youth Program, Change 1 policy: Service provider selection and procurement provisions

Each local board (or its fiscal agent) has the option of directly providing some or all of the required youth employment and training activities, rather than entering into a grant or contract to provide the activities.[1] If a local board chooses to award grants or contracts to youth service providers to carry out some or all of the youth employment and training activities, the following requirements apply.

1. The local board must ensure that grants and contracts are awarded on a competitive basis and must procure youth service providers in accordance with:[2]
    a. local procurement policies and procedures and applicable state and local procurement laws; and

   b. principles of competitive procurement in 2 CFR Parts 200 and 2900 (the Uniform Guidance), including 2 CFR Part 180 (OMB Guidelines to agencies on Government-wide Debarment and Suspension (Non-procurement)).
2. If the local board determines there are an insufficient number of youth service providers in the local area, such as a rural area, the local board may award grants or contracts on a non-competitive basis.[3] Non-competitive procurement must be conducted in accordance with:[4]
   a. local procurement policies and procedures and applicable state and local procurement laws; and
   b. principles of non-competitive procurement in 2 CFR Parts 200 and 2900 (the Uniform Guidance), including 2 CFR Part 180 (OMB Guidelines to agencies on Government-wide Debarment and Suspension (Non-procurement)).
3. The local board may implement a pay-for-performance contract strategy for one or more of the required 14 program elements and may reserve and use not more than 10 percent of the total youth program funds allocated to the local area for pay-for-performance contract strategies.[5]
4. When selecting youth service providers, the local board must take into consideration the ability of youth service providers to meet performance accountability measures based on the primary indicators of performance for youth programs,[6] which are described in detail in the State's performance accountability policy.[7]
5. If the local board has a standing youth committee, the local board may assign the function of selecting and recommending youth service providers to the committee.[8]
6. Contracts for training services may be used instead of ITAs only when the local board has fulfilled the applicable consumer choice requirements *and* at least one of the following conditions exist.[9]
   a. The training services are on-the-job-training (OJT), customized training, incumbent worker training, or transitional jobs.
   b. The local board determines there are an insufficient number of ETPs in the local area to accomplish the purpose of a system of ITAs. The local board's determination process must be described in its local plan, which must provide for a public comment period of at least 30 days for interested providers of training services. If the local board elects to contract with training providers for occupational skills training, the local board must ensure the providers are authorized or licensed to provide training services in Nebraska or to Nebraska residents by applicable accrediting or governing authorities, which may include the Nebraska Department of Education according to the requirements of the Nebraska Private Postsecondary Career School Act (Title 92, Nebraska Administrative Code, Chapter 41).
   c. The local board determines there is a program of training services offered in the local area by a community-based organization (or other private organization) that has demonstrated effectiveness in serving individuals with barriers to employment, subject to the following requirements.
      i. The local board must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the individuals with barriers to employment to be served. The criteria may include:
         1. financial stability;
         2. demonstrated performance in the delivery of services to individuals with barriers to employment based on measures such as program completion rate; attainment of the skills, certificates, or degrees the program is designed to provide; placement after training in unsubsidized employment; and retention in employment; and
         3. how the specific program relates to the workforce investment needs identified in the board's local plan.
   d. The local board determines that it would be most appropriate to contract with an institution of higher education (or other accredited, authorized, or licensed provider of training services) in order to facilitate the training of *multiple individuals* in in-demand industry sectors or occupations, as long as the contract does not limit consumer choice. If the selected provider of training services is not an institution of higher education, the provider must be authorized or licensed to provide training services in Nebraska or to Nebraska residents by applicable accrediting or governing authorities, which may include the Nebraska Department of Education according to the requirements of the Nebraska Private Postsecondary Career School Act (Title 92, Nebraska Administrative Code, Chapter 41).
   e. The local board is considering entering into a pay-for-performance contract and ensures that the contract is consistent with the requirements of 20 CFR § 683.510.

Procurement policy: Administrative requirements and procurement standards and methods

Administrative requirements

The provisions of the policy apply to administrative entities in their role as pass-through entities that award:

- subawards to subrecipients to carry out part of the local WIOA Title I program; and
- contracts to contractors for purchasing property or other services needed to carry out WIOA Title I programs.

Procurement standards

Administrative entities must follow the procurement standards established in the Uniform Guidance, key provisions of which are summarized below to stress their importance.

Each administrative entity must:

1. use its own documented procurement policies and procedures, provided they conform to the standards identified in the Uniform Guidance;[10]
2. maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of subawards and contracts;[11]
3. maintain written standards of conduct covering organizational conflicts of interest if the administrative entity has a parent, affiliate, or subsidiary organization that is not a state or local government;[12]
4. maintain, retain, and provide access records detailing the history of procurement;[13]
5. make case-by-case determinations on:
    a. whether the third party qualifies as a subrecipient or a contractor based on the substance of the administrative entity's relationship with that party;[14] and
    b. the appropriate legal instrument for procurement (grant agreement, pay-for-performance contract, cooperative agreement, contract) and ensure that the provisions required under the Uniform Guidance are included;[15]
6. conduct all procurement transactions in a manner providing full and open competition;[16]
7. take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and firms in labor surplus areas[17] are used when possible;[18]
8. ensure that subawards and contracts are not awarded to third parties that are debarred, suspended, or excluded from or ineligible for participation in Federal programs;[19]
9. award subawards and contracts only to third parties capable of successful performance under the provisions of their respective agreement or contract;[20]
10. maintain oversight to ensure that subrecipients perform according to the provisions of their respective grant agreement, pay-for-performance contract, or cooperative agreement;[21] and
11. be responsible for the settlement of all contractual and administrative issues arising out of agreements and contracts.[22]

Procurement methods

Table 36 provides an overview of permitted procurement methods, which are described in detail in 2 CFR § 200.320. Local boards must use one of these methods or the leveraged resource method described below Table 36.

Table 36. Methods of Procurement[23]

Method	Description
Micro-purchase	Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold.[24] To the extent possible, local boards must distribute micro-purchases equitably among qualified third parties. Micro-purchases may be awarded without soliciting competitive quotations if the local board considers the price to be reasonable.
Small purchase procedure	The small purchase procedure is the relatively simple and informal procurement method for securing services that do not cost more than the Simplified Acquisition Threshold.[25] If small purchase procedure is used, price or rate quotations must be obtained from an adequate number of qualified third parties.
Sealed bid (formal advertising)	Under the sealed bid procedure, bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the third party whose bid, conforming to all the material terms and conditions of the invitation for bids, is the lowest in price.

Method	Description
Competitive proposal	The technique of the competitive proposal is normally conducted with more than one provider submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids.
Noncompetitive (sole-source) proposal	The noncompetitive (sole-source) proposal method is procurement through solicitation of a proposal from only one third party. Noncompetitive procurement may be used only when: • the item is available only from a single source; • public exigency or emergency will not permit a delay resulting from competitive solicitation; • the US Department of Labor Employment and Training Administration *or* NDOL expressly authorizes noncompetitive proposals in response to a written request from the administrative entity; • after solicitation of a number of sources, competition is determined inadequate; or • there are an insufficient number of eligible youth providers or Eligible Training Providers in the local area, which is determined according to local procurement policies and procedures.[26]

Leveraged resources[27]

Local WIOA Title I programs are not required to use program funds for procurement of program services and may leverage partner resources to provide some or all services. If a program service is not funded with program funds, the local board or applicable Title I program provider must:

- have a written agreement with the partner to ensure that the service will be offered; and
- ensure that the service is closely connected to and coordinated with the program.

[1] WIOA Sec. 123(a); 20 CFR § 681.400(a)
[2] WIOA Sec. 123(a); 2 CFR § 200.213; 20 CFR § 681.400(b)(2); TEGL 21-16
[3] WIOA Sec. 123(b); 20 CFR § 681.400(b)(4); TEGL 21-16
[4] 2 CFR § 200.213; 20 CFR § 681.400(b)(4); TEGL 21-16
[5] 20 CFR § 681.420(i). Refer to 20 CFR § 683.500 for regulations on pay-for-performance contract strategies. Local boards may request technical assistance on use of pay-for-performance contract strategies.
[6] 20 CFR § 681.400(b)(1)
[7] The State's policies are accessible at https://dol.nebraska.gov/EmploymentAndTraining/LCRWP/WIOA/Policies.
[8] 20 CFR § 681.400(b)(3); TEGL 8-15. Refer to the State's policy on workforce development boards and chief elected officials for information on standing youth committees.
[9] 20 CFR § 680.320(a)
[10] 2 CFR § 200.318
[11] Refer to 2 CFR § 200.318(c) and the State's policy on workforce development boards and CEOs for additional information on conflict of interest requirements.
[12] Ibid.
[13] Refer to 2 CFR §§ 200.318(c)(1), 200.333, 200.336, 200.337, and the State's policy on records management for information on requirements regarding records maintenance, retention, and access.
[14] 2 CFR § 200.330
[15] Refer to the Uniform Guidance, including 2 CFR §§ 200.331 and 200.326, and Appendix II to Part 200 for information on required provisions. In addition, refer to 20 CFR Parts 680, 681, and 683 for regulations on pay-for-performance contracts contract strategies.
[16] Refer to 2 CFR § 200.319 for standards on competition.
[17] For information on *labor surplus areas*, refer to the US Department of Labor "Labor Surplus Area: Frequent Asked Questions" webpage at https://www.doleta.gov/programs/lsa_faq.cfm.
[18] 2 CFR § 200.321
[19] 2 CFR § 200.213
[20] 2 CFR § 200.318
[21] 2 CFR § 200.318
[22] Ibid.
[23] 2 CFR § 200.320; 20 CFR § 681.400(b)(4); TEGL 21-16
[24] As of the effective date of this policy, the micro-purchase threshold is $3,000. This threshold is periodically adjusted for inflation. [2 CFR § 200.67]

[25] As of the effective date of this policy, the simplified acquisition threshold is $150,000. This threshold is periodically adjusted for inflation. [2 CFR § 200.88]
[26] 20 CFR §§ 679.370(l)(1), 680.320(a)(2), and 681.400(b)(4)
[27] 20 CFR § 681.470

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.*

Nebraska will improve outcomes for OSY by ensuring the 14 required program elements are accessible throughout the state and supported through braiding of partner resources to best meet needs of OSY. Youth program elements will be funded with WIOA Title I youth funds or provided through leveraged partner resources at no cost. Local boards establish agreements with youth program service providers and other partners to ensure that program elements are connected and coordinated with local Title I youth programs and part of each OSY's individual service strategy (ISS).

An ISS is developed between each OSY and their respective Title I youth program case manager that establishes short and long-term goals for credential attainment and/or work-based training leading to unsubsidized employment. For co-enrolled OSY, case management will be coordinated across the programs serving the OSY and a primary case manager will be identified. Case management (including joint case management) will be designed around the needs of the OSY to ensure career pathways are developed based on needs assessments to ensure ongoing and successful progress and achievement of short- and long-term goals identified in the ISS, including soft-skills and basic skills development, credential attainment (including high-school diplomas or equivalents), and participation in occupational skills training or work-based training.

Local Title I youth programs coordinate with local Title II Adult Education providers, Title III Wagner-Peyser Employment Service, Title IV vocational rehabilitation programs, and other state plan partner programs, including TANF and SNAP, to coordinate services, eliminate duplication of services, and maximize use of partner resources in order to provide OSY with access to the full array of workforce investment activities available through the state's one-stop delivery system. The State and local Title I programs also work closely with other organizations serving homeless youth, youth in the foster care system, youth with disabilities, justice-involved youth, and youth who have dropped out of school or are graduating from high school.

Co-enrollment

Title I youth program providers must co-enroll youth program participants when eligibility permits. Partner programs in which participants may be co-enrolled include:

- local adult and dislocated worker programs;
- Adult Education and Family Literacy Act program;
- Wagner-Peyser;
- vocational rehabilitation programs provided by the:
    - Nebraska Commission for the Blind and Visually Impaired; and
    - Nebraska Vocational Rehabilitation Program;
- DWG;
- Indian and Native American (INA) employment and training programs;
- Job Corps;
- JVSG;
- National Farmworker Jobs Program provided by Proteus;
- Senior Community Service Employment Program (SCSEP) provided through the Nebraska Department of Health and Human Services;
- TAA;
- Unemployment Insurance; and
- employment and training programs provided by:
    - Supplemental Nutrition Assistance Program (SNAP); and
    - Temporary Assistance for Needy Families program (TANF);
- YouthBuild.

Connected Youth Initiative (http://www.central-plains.org/connected-youth-initiative-1.html)

The Connected Youth Initiative (CYI) seeks to build Connected Youth Communities and collaborations across rural Nebraska to help unconnected youth with experience in the foster care and juvenile justice systems and those struggling with homelessness or are disconnected from a family structure. CYI is youth driven and utilizes community resources to improve youth opportunities and networks for housing, transportation, health care, connections to peer and adult supports, educational attainment, employment, career pathways, and financial empowerment. Central Plains Center for Services partners across the state in bringing CYI to rural Nebraska.

JAG Nebraska

As described in Sections II(a)(2)(C) and VII (TANF) of this plan, JAG Nebraska (the Jobs for America's Graduates program operating in Nebraska) is a state-based program currently operating in the Greater Nebraska Workforce Development Area, with active plans to expand statewide. JAG Nebraska is dedicated to supporting youth who face significant challenges and keeping those youth in school through graduation and supporting pursuit of postsecondary education and quality entry-level jobs leading to career advancement opportunities following graduation. The Nebraska Department of Health and Human Services (NDHHS) has an interagency agreement with the Nebraska Department of Labor (NDOL) to fund JAG Nebraska. Eligible TANF youth must have barriers, as defined by JAG Nebraska, that put them at risk in relation to high school graduation, pursuit of postsecondary education, or successful transition into the labor force. (TANF services provided under JAG Nebraska are considered non-assistance by NDHHS.)

Nebraska Continuum of Care System

The Continuum of Care System is a community- and regionally-based process that provides a comprehensive and coordinated housing and service delivery system. The US Department of Housing and Urban Development initiated the Continuum of Care process in 1994. The process promotes a coordinated and strategic planning approach for programs that assist families and individuals who are homeless or at risk of homelessness. The Continuum of Care System has the goal of stably housing all persons who are homeless or at risk of homelessness. This means identifying all homeless and at-risk-of-homelessness populations in communities, including youth, understanding their needs, and building a comprehensive and responsive system. The Continuum of Care System helps communities and regions strategically plan for and provide a balance of emergency, transitional, and permanent housing and services to address the needs of individuals who are homeless or at risk of homelessness, so they are able to make the critical transition to jobs, independent living, and permanent housing. It is widely recognized that homelessness is not due to just a lack of shelter. Homelessness encompasses a wide range of conditions and involves a variety of unmet needs as well as underlying economic, physical, and social challenges. Nebraska's Continuum of Care System operates statewide through the:

- Lincoln Continuum of Care;
- Metro Area Continuum of Care for the Homeless; and
- Nebraska Balance of State Continuum of Care.

Two of Nebraska's three local boards have entered memorandums of understanding regarding referrals between local Title I programs and the continuums of care and coordination of services between the programs and continuums. The third local board is currently working on establishment of a similar memorandum of understanding. Further, the Nebraska Workforce Development Board is working on implementation of a memorandum of understanding with the continuums in support of their collaboration and coordination of services with local Title I programs.

Project Everlast (https://www.projecteverlast.org/omaha/)

Project Everlast works to help foster youth establish lifelong connections. These youth deserve the advice, support, and community built for typical teens. Project Everlast promotes use of community resources to improve youth opportunities and networks for:

- housing;
- transportation;
- health care;
- education;
- employment;
- daily living; and

- personal and community engagement.

Starting at Project Everlast's inception in 2007, keeping the youth voice front and center was the primary goal. Youth representatives with experience in foster care played a key role in the initial planning process in Omaha, and have continued to shape the direction of Project Everlast.

- Council members are asked for input on legislative bills, new programs, and policy changes that effect youth in care, a big example of that is the work that was done on the Bridges to Independence program, the Know Your Rights brochure, and the Youth Court Questionnaire.
- Legislative Day is an annual event where young people present their support of legislative bills that may be heard during the legislative session that affect youth and young adults.
- Project Everlast's statewide councils. Across the state, these dedicated youth groups connect with one another and the larger community through service projects, training and education, and opportunities to have input in the state's management of the foster care system.
- Governor's Youth Advisory Council. This select group of young people has the opportunity to provide input directly to Nebraska's Governor on issues affecting them.
- Speakers Bureau. A collection of expertly trained young people who are empowered to share their stories for policy makers, community groups, and private philanthropic organizations.

SNAP Next Step (http://dhhs.ne.gov/Pages/SNAP-Next-Step.aspx)

As described in Sections II(a)(2)(C), II(c), VII (TANF), and VII (SNAP), SNAP Next Step is an employment and training program provided by the Nebraska Department of Health and Human Services and the Nebraska Department of Labor (NDOL) that places under-employed clients of the Supplement Nutrition Assistance Program in jobs that pay family-sustaining wages (described in Section II(a)(2)(C) of this plan).

United Way Opportunity Youth Initiative (https://www.unitedwaymidlands.org/initiative-opportunity-youth/)

The Opportunity Youth Alliance (OYA) is a collective impact group that works to connect youth to basic-needs services, educational opportunities, and employment prospects. Created with help from the national Forum for Youth Investment, guidance from the Aspen Institute, and research from the US Department of Education, the Alliance formalized community efforts to serve opportunity youth. Currently, OYA consists of more than 40 agency partners with participation from government, non-profit and for-profit employers from across the Omaha-Council Bluffs metro area. As part of its work to reconnect opportunity youth to education and employment, OYA mapped existing services and resources that serve disconnected youth in the Omaha-Council Bluffs metro area. Through this effort, OYA recognized a need to link existing community support systems and help youth navigate those systems. This led OYA to develop and implement the Opportunity Youth Hub. The Hub is housed at Nebraska Children and Families Foundation (NCFF), expanding NCFF's existing work with youth aging out of foster care. The Hub helps program providers access community resources for opportunity youth clients and provides direct navigation services to opportunity youth. Navigation coaches assigned by the Hub support the success of opportunity youth in three ways:

- Ensure stability: To help opportunity youth achieve stability, a Hub coach connects the youth to community resources such as housing supports, health services, clothing assistance, food access and more.
- Reconnect opportunity youth: Once opportunity youth have secured basic supports, the Hub coach leverages local partnerships to connect the individual to education, training, and employment services.
- Provide a safety net: Opportunity youth will face continued barriers while developing skills and knowledge necessary to succeed. The Hub and the assigned coach also act as a safety net while the youth continues down the path to stability.

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]*

[12] Sec. 102(b)(2)(D)(i)(I)

The State's current Youth Program policy (accessible at https://dol.nebraska.gov/webdocs/getfile/fcdffa41-59b3-4734-9e21-611a11726876) requires that local boards:

- include in their local plan a description of the design framework of their local youth programs, including how the 14 program elements required under 20 CFR § 681.460 are made available within that framework; and

- establish agreements with youth service providers to ensure that the program elements will be offered and are connected and coordinated with the youth program.

The State reviews local plans to determine whether local boards have sufficiently designed the framework of local Title I youth programs and effectively planned for the provision of the 14 youth program elements. If local plans do not adequately describe frameworks for local youth programs, the State requires revision of the local plans and provides technical assistance to ensure that youth program elements are made available and effectively implemented. Annually, through the State's monitoring process, the availability and provision of youth program elements in each local area are reviewed to determine effective implementation of the program elements based on the criteria established under the State's policies, as well as WIOA and its implementing regulations. In addition to the State's monitoring process, the State will continue to provide technical assistance to local youth programs regarding the State's policies and provide technical assistance on an ad hoc basis based on specific needs. The State also provides continued technical assistance to local youth programs regarding performance on youth program performance indicators based on quarterly and annual youth program performance reports and will require corrective action when local youth programs fail to meet negotiated levels of performance.

Consistent with WIOA Sec. 129(c)(5), the policy does not require that each local youth program provider must provide all 14 required program elements. Instead, the policy requires that the local youth program provider provide *access* to all of the required elements based on established agreements with youth service providers. Through the State's monitoring process, the State determines if local boards have established appropriate agreements with youth service providers that ensure the availability of all youth program elements. The State provides technical assistance to local youth programs when it is determined that the programs have not established appropriate agreements that ensure the availability of all youth program elements as described in the State's current youth program policy and current procurement policy (accessible at https://dol.nebraska.gov/webdocs/getfile/74033c46-a0f6-4794-b072-d9f0b23c0096).

The State's Apprenticeship Program Coordinators work with the State's Title I Program Coordinator and local Title I programs and business services representatives regarding the availability and benefits of quality pre-apprenticeship programs. The Program Coordinators work together to provide information and technical assistance to local Title I youth programs regarding quality pre-apprenticeship and youth Registered Apprenticeship programs operating in Nebraska.

The State's current Workforce Development Board and Chief Elected Officials policy (accessible at https://dol.nebraska.gov/webdocs/getfile/6966edac-c4d9-47a6-9122-e58c18351d3e) also requires that local boards, in partnership with the local CEO, provide oversight and monitoring of Title I programs, as described in Table 37.

Table 37. Required oversight and monitoring activities for local boards and CEOs

Required activity
Conducting oversight and monitoring of Youth, Adult, and Dislocated Worker program activities and the entire one-stop delivery system in the local area[1]
Ensuring appropriate use and management of funds provided under WIOA Title IB for youth, adult, and dislocated worker activities and the one-stop delivery system in the local area;[2]
For workforce development activities, ensuring appropriate use, management, and investment of funds to maximize performance outcomes under WIOA Sec. 116[3]
Providing oversight and monitoring of local area operations and activities supported by WIOA Title IB funding[4]
Monitoring local board activities to:[5] assure compliance with applicable Federal requirements; and assure performance expectations are being achieved
Conducting monitoring of subawards to one-stop operators, service providers, and other subrecipients to ensure (1) subawards are used for authorized purposes in compliance with Federal statutes, regulations, and the terms and conditions of the subaward and (2) subaward performance goals are achieved, which must include:[6] reviewing financial and performance reports required of the subrecipient by the local board; ensuring that subrecipients take timely and appropriate action on all deficiencies detected through audits, on-site reviews, and other means; and issuing a management decision for audit findings as required by 2 CFR § 200.521
Ensuring contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders[7]
Evaluating and monitoring the local board's compliance with statutes, regulations and the terms and conditions of its WIOA grant agreement[8]

Required activity
Taking prompt action when instances of noncompliance are identified, including noncompliance identified in audit and monitoring findings[9]

The State Monitor reviews local area monitoring and oversight procedures and activities regarding the ongoing availability and effective implementation of youth program elements. The State Monitor coordinates with the State's Title I Administrator, Program Coordinator, and Program Analyst to determine the completeness of the procedures and activities. Technical assistance is provided if it is determined that monitoring and oversight procedures and activities are inadequate.

[1] 20 CFR § 679.370(i)(1)
[2] 20 CFR § 679.370(i)(2)
[3] 20 CFR § 679.370(i)(3)
[4] 2 CFR § 200.328
[5] 2 CFR § 200.328
[6] 2 CFR § 200.331(d)
[7] 2 CFR § 200.318(b)
[8] 2 CFR § 200.303(c)
[9] 2 CFR § 200.303(d)

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.*

Definitions and eligibility documentation requirements regarding the "requires additional assistance" criteria must be established at the local level pursuant to the State's policy on program eligibility for youth, adults, and dislocated workers (accessible at https://dol.nebraska.gov/webdocs/getfile/7d10d55e-e4cd-4543-8f52-3b3993b763d3). The State will ensure that local areas have policies regarding these criteria through the State's monitoring process.

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.*

Neb. Rev. Stat. § 79-201. Compulsory education; attendance required; exceptions; reports required.

(1) For purposes of this section, a child is of mandatory attendance age if the child (a) will reach six years of age prior to January 1 of the then-current school year and (b) has not reached eighteen years of age.

(2) Except as provided in subsection (3) of this section, every person residing in a school district within the State of Nebraska who has legal or actual charge or control of any child who is of mandatory attendance age or is enrolled in a public school shall cause such child to enroll in, if such child is not enrolled, and attend regularly a public, private, denominational, or parochial day school which meets the requirements for legal operation prescribed in Chapter 79, or a school which elects pursuant to section 79-1601 not to meet accreditation or approval requirements, each day that such school is open and in session, except when excused by school authorities or when illness or severe weather conditions make attendance impossible or impracticable.

(3) Subsection (2) of this section does not apply in the case of any child who:

(a) Has obtained a high school diploma by meeting the graduation requirements established in section 79-729;

(b) Has completed the program of instruction offered by a school which elects pursuant to section 79-1601 not to meet accreditation or approval requirements;

(c) Has reached sixteen years of age and has been withdrawn from school pursuant to section 79-202;

(i) Will reach six years of age prior to January 1 of the then-current school year, but will not reach seven years of age prior to January 1 of such school year,

(ii) such child's parent or guardian has signed an affidavit stating that the child is participating in an education program that the parent or guardian believes will prepare the child to enter grade one for the following school year, and (iii) such affidavit has been filed by the parent or guardian with the school district in which the child resides;

(iii) Will reach six years of age prior to January 1 of the then-current school year but has not reached seven years of age,

(iv) such child's parent or guardian has signed an affidavit stating that the parent or guardian intends for the child to participate in a school which has elected or will elect pursuant to section 79-1601 not to meet accreditation or approval requirements and the parent or guardian intends to provide the Commissioner of Education with a statement pursuant to subsection (3) of section 79-1601 on or before the child's seventh birthday, and

(v) such affidavit has been filed by the parent or guardian with the school district in which the child resides; or

(vi) Will not reach six years of age prior to January 1 of the then-current school year and such child was enrolled in a public school and has discontinued the enrollment according to the policy of the school board adopted pursuant to subsection (4) of this section.

(4) The board shall adopt policies allowing discontinuation of the enrollment of students who will not reach six years of age prior to January 1 of the then-current school year and specifying the procedures therefor.

(a) Each school district that is a member of a learning community shall report to the learning community coordinating council on or before September 1 of each year for the immediately preceding school year the following information:

(b) All reports of violations of this section made to the attendance officer of any school in the district pursuant to section 79-209;

(c) The results of all investigations conducted pursuant to section 79-209, including the attendance record that is the subject of the investigation and a list of services rendered in the case;

(d) The district's policy on excessive absenteeism; and

(e) records of all notices served and reports filed pursuant to section 79-209 and the district's policy on habitual truancy.

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 State defines "basic skills deficient" according to WIOA Sec. 3(5)(A)-(B), as an individual who is a:

- youth that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- youth or adult that 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.

The State requires that local boards establish policies that:[1]

- describes quantifiable methods that must be used to determine eligibility based on the "basic skills deficient" criterion, which must include use of assessment instruments that are valid and appropriate for the target population and the provision of reasonable accommodations during the assessment process for individuals with disabilities; and
- describes documentation required to demonstrate basic skills deficiency, as required for Federal reporting, based on this criterion.

[1] 20 CFR § 681.290(b) – (c)

d. Single-area State Requirements

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

Nebraska is not a single-area state.

e. Waiver Requests (optional)

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

Nebraska is not requesting waivers at this time.

Title I-B Assurances

The State Plan must include assurances that:

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 legal requirements for membership;	Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes

The State Plan must include	*Include*
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 Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	78.0%	78.0%	78.0%	78.0%
Employment (Fourth Quarter After Exit)	78.5%	78.5%	78.5%	78.5%
Median Earnings (Second Quarter After Exit)	$6,000	$6,300	$6,000	$6,300
Credential Attainment Rate	56.0%	61.0%	56.0%	61.0%
Measurable Skill Gains	41.0%	41.0%	41.0%	41.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

Dislocated Program Performance Indicators

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	86.4%	86.4%	86.4%	86.4%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Fourth Quarter After Exit)	85.9%	85.9%	85.9%	85.9%
Median Earnings (Second Quarter After Exit)	$7,500	$8,250	$7,500	$8,250
Credential Attainment Rate	51.7%	60.0%	51.7%	60.0%
Measurable Skill Gains	45.0%	45.0%	45.0%	45.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

Youth Program Performance Indicators

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	71.7%	78.0%	71.7%	78.0%
Employment (Fourth Quarter After Exit)	68.6%	77.0%	68.6%	77.0%
Median Earnings (Second Quarter After Exit)	$3,545	$3,545	$3,545	$3,545
Credential Attainment Rate	54.8%	54.8%	54.8%	54.8%
Measurable Skill Gains	41.8%	41.8%	41.8%	41.8%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

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.*

Nebraska is examining all opportunities to utilize new regulations allowing flexibilities for staffing the provision of labor exchange services under the Wagner-Peyser Act. At this time, no decisions have been made. Nebraska will continue to staff labor exchange services using state merit-staff employees until decisions have been made.

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*

Professional development opportunities will be made available to Wagner-Peyser Employment Service (ES) staff through a variety of methods, including:

- Wagner-Peyser in-service trainings provided by program administration, focused on specific topics and agenda items that will provide insight and guidance to assist job in performing Wagner-Peyser duties, such as:
    - serving individuals with disabilities, veterans, MSFWs, and unemployment insurance claimants;
    - using labor market information in career planning and reemployment;
    - resume writing and interviewing best practices;
    - presentation skills;
    - motivational interviewing skills; and
    - active listening skills;
- the State of Nebraska Employee Development Center, which provides training opportunities in-person and through technology (webinars, recorded trainings, live streaming, etc.) on a variety of topics ranging from technical skills to customer service for government employees; and
- one-stop delivery system and community-partner trainings and conference opportunities.

Staff development will focus on assessing and reinforcing the core responsibilities and functions of ES, while also addressing new opportunities for ES to expand its role with special projects or initiatives. ES staff and managers will be given the opportunity to identify their training needs through yearly surveys.

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*

The NDOL Office of Unemployment Insurance (UI) is developing new online training modules to train ES and WIOA Title I staff on basic UI information and claimant eligibility. These new trainings will reflect the 2019 roll out of a new UI technology system. UI also conducts training for ES and WIOA Title I staff throughout the year to assist staff in identifying potential UI eligibility issues. ES and WIOA Title I staff are trained by UI supervisors to identify potential UI eligibility issues and then to report the issues to UI staff on an Eligibility Review Form (ERF), a document that identifies the potential eligibility issue. Written guidance for the ERF is reviewed by UI staff and provided in program manuals for ES and WIOA Title I staff. Referrals regarding potential issues are provided to UI staff for adjudication. The referral process involves emailing the ERF to UI staff for identification and adjudication of the potential issue. UI staff communicates the referral process for information to ES and WIOA Title I staff and other one-stop partners and provides staff training to all interested parties.

UI is integrated into and highly involved in the mandatory annual training conducted for ES staff; and partner programs are invited to attend the trainings to gain a better understanding of the UI system and procedures. Partner trainings are conducted at the UI administrative building and on site at AJCs to best accommodate partner needs and resources. UI also provides legislative and programmatic updates to ES and WIOA Title I staff, as they occur, to inform staff of potential impacts to the shared customer base.

b. Meaningful assistance

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

UI provides dedicated phone lines in the one-stop centers across the state. The phones are labeled with a sign designating them as a resource for individuals seeking assistance with filing an UI claim. In addition to the dedicated phones, there are also dedicated computers for use of filing an UI claim. ES staff is trained on the process for UI claim filing by customers and provide direct assistance with customer questions about the general UI process. In addition to dedicated phones, there is also dedicated UI benefits staff in the Grand Island, Lincoln, and Omaha AJCs that provide direct assistance to customers while navigating the initial UI claim and the weekly claims process. When UI staff is not present in a one-stop center, high levels of customer service can still be achieved as UI staff have the ability to remote in, on select computers in the one-stop centers to provide real-time technical assistance to customers filing for UI benefits. While ES staff is not equipped to provide direct information on UI customer benefits, one-stop center staff focuses on quality customer service and a streamlined customer experience.

One-stop centers are provided with UI information and materials that can be disseminated to customers with questions on filing UI claims. The information is reviewed with the customers to clarify language and provide guidance on the steps a customer must follow to file an UI claim, weekly certification, and job searches in NEworks. The use of NEworks, the integrated single sign-on system claimants use to register for work and file a UI claim, streamlines the process for claimants by allowing one-stop centers to provide information and assistance. One-stop center staff is

trained on use of NEworks as a tool to provide employment and UI benefits navigational services. Staff's strong knowledge and constant use of the system allows them to provide meaningful assistance to UI claimants as they use the system to file UI claims, register for work, and meet work search requirements.

Meaningful assistance is provided through direct information related to filing of UI claims and additional support and guidance around work search activities. ES staff is cross-trained with UI staff and supervisors to have a better understanding of the claimants' experience and challenges when filing UI claims. This information and shared experience provides claimants with as much assistance as possible, whether they are talking to ES or UI staff.

c. Reemployment assistance

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

Overview

Nebraska's reemployment strategy for UI claimants and other unemployed individuals has led to the development of the NEres program. NEres creates a single, comprehensive service model for delivering reemployment services, with the UI claimant as the core consumer of the model. UI claimants are customers of the one-stop delivery system. Nebraska places an emphasis on early intervention and continuing engagement with UI claimants, with a goal of gainful employment. This reemployment strategy allows claimants and job seekers to enter the reemployment system through a common entry point and their connection with an array of services and tools needed for effective job searching and rapid reemployment. With NEres, Nebraska uses technology and innovative strategies to assist UI claimants and job seekers in their return to the workforce.

NEres connects unemployed individuals with the full range of reemployment services available through NDOL. NEres seeks to accelerate opportunities for individuals to obtain gainful employment after job separation. NEres was developed to meet the Federal requirements of the Worker Profiling Reemployment System (WPRS) and Reemployment and Eligibility Assessment (REA) programs. NEres has evolved to meet the standards of newly implemented of Reemployment Services and Eligibility Assessment (RESEA) program, which replaced REA. Since its development, NEres has expanded its services to include all initial non-exempt UI claimants in order to provide early intervention and resources to promote quick reentry into the workforce. The use of high quality, effective reemployment tools is the cornerstone of NEres and is the key strategy for developing an available workforce for Nebraska. NDOL's Office of Unemployment Insurance and Office of Employment and Training collaborate extensively and continue to strengthen its partnership to provide employment services and reemployment assistance to Nebraskans impacted by job loss.

Each NEres service has a defined set of criteria that are designed to assist claimants and job seekers in meeting their reemployment needs and program requirements. NEres services provided to claimants include:

- 1-on-1 Visits: program and one-stop center orientation; LMI; skills assessment overview (Nebraska Career Connections and NEworks); work search activities; UI eligibility assessment; Individual Employment Plans (IEPs); review of skills assessment; review of work search activities.
- referral to necessary services: workshops; Wagner-Peyser Employment Service; training services; Nebraska VR Program; WIOA Title I programs; Veteran services; other one-stop services; services available through community-based organizations.
- appropriate follow-up services: comparing employment status to IEPs; review work search activities; meeting with claimants up to two additional times.

Reemployment Opportunities

NEres provides tools and resources for individuals to increase their re-employment options via successful job matching. Through NEres, quality job matches are initiated through:

- work search activities;
- job referrals; and
- virtual recruiter notifications.

These preliminary steps to a successful job match provide NEres participants the opportunity to explore viable employment options that match their knowledge, skills, and abilities (KSA). Employment opportunities that are refined by and based on participant KSAs will lead to greater success in reemployment.

NEres Service Delivery and Locations

NEres staff is headquartered at primary NEres locations across the six regions of the state and provide one-on-one visits, referrals to services, and follow-up services provided in person or face-to-face through video conferencing. Claimants are directed to the appropriate NEres location based on their home county.

d. Use of WP funds to support UI claimants and communications between WP and UI

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

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

Wagner-Peyser funds are used to support UI claimants through regular and ongoing provision of labor-exchange services. NDOL uses NEworks as its labor exchange platform. NEworks offers customers a powerful and robust system for job searches. From quick job searches to advanced searches, NEworks features a host of options to view and apply for job openings across the state. NEworks provides job search and employment assistance opportunities that can be self-assisted or staff-assisted. As a web-based system, NEworks provides claimants with 24/7 access to look for employment opportunities that meet their needs at their convenience. NEworks also allows staff and employers to view job seeker resumes, work history, and create job referrals based on the claimants' interests, skills, and abilities. The Virtual Recruiter provided in NEworks is another job-matching tool that provides claimants with direct information about employment opportunities that match their interests, skills, and abilities. Further, ES supports UI claimants through job search and placement assistance by providing staff-assisted services based on the needs of each claimant and their employment goals and work experience, including:

- evaluation of claimant abilities, job search approaches, advice on alternatives job search techniques, and assistance with company and industry research;
- resume-development in one-on-one and group workshop settings; and
- development of cover letter`s and other employment related correspondence.

ES also utilizes additional technology platforms to disseminate information to and communicate with UI claimants. Social media, virtual services, and user-friendly mobile applications provide 24/7 access to services and communication tools intended to support employment opportunities. The same tools allow program staff to follow-up, maintain contact with claimants, and ensure ES and reemployment services for UI claimants are being utilized in an effective manner to promote and encourage reemployment and career opportunities that match job seekers' KSAs.

In addition to the services and assistance for claimants provided through NEworks and other platforms, ES coordinates with UI on a regular basis to discuss the provision and recording of reemployment services for UI claimants and assess current practices for opportunities for improvement. UI supervisors and staff are included in ES training, as participants and trainers, in order to communicate necessary and relevant strategies for provision of reemployment services to shared customers.

In October 2019, NDOL implemented an enhancement to NEworks that fully integrated the NEworks labor exchange platform with NDOL's UI benefit payment system. The enhanced system allows UI claimants to search for work, maintain eligibility for UI benefits, and connect with reemployment services through one integrated system.

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

UI claimants are required by Nebraska state statute to register with the state's labor exchange system, NEworks. NEworks is the single sign-on system for ES customers and UI claimants. ES staff works directly with UI claimants in one-stop centers or by phone to provide registration assistance on the NEworks system. Computers available in the resource rooms at one-stop centers provide direct customer access to NEworks and staff assistance is available, when necessary. ES staff recognizes that some customers lack computer literacy skills. To assist customers in overcoming this barrier, ES coordinates with local literacy groups, education institutions, and community-based organizations to provide computer literacy services, either in the one-stop centers or at other locations in the community. ES also conducts NEworks workshops to assist claimants in registering for work and navigating the labor exchange system. ES workshops include NEworks registration, resumes workshops, and job search workshops.

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

ES staff is trained by NDOL's Office of Unemployment Insurance (UI) regarding eligibility issues and how to communicate those issues to UI. UI is exploring refining reporting processes and making that process seamless for ES and UI staff. Identified eligibility issues are documented and communicated to UI the same day the issues are identified to allow UI to follow up accordingly. UI Staff will also be trained in referring claimants in need of job search assistance to ES staff.

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

ES staff assesses claimants to determine their KSAs. Assessments include an initial assessment, either a formal or informal needs assessment based on first direct contact with claimants to determine their needs and appropriate services. Assessments may also include an interest/aptitude and skills assessment, which involves the administration of a formal assessment measuring the possession of, interest in, or ability to acquire job skills or knowledge. Examples of interest/aptitude and skills assessments include Nebraska Career Connections, NEworks Skills Analyzer, O*NET Online, My Next Move, Career One Stop, My Skills My Future, and CASAS.

Based on claimant conversations, interviews, and assessments, ES staff makes appropriate referrals to employment, training, and education programs that can assist claimants with acquiring necessary upskilling required to be competitive in their reemployment efforts. Referrals to employment, training, and education programs are based on claimant needs and circumstances. Referrals are documented in NEworks to track progress of partnership development and use of community resources. ES staff also provide additional assistance if required by claimants regarding completion of application or job-reference materials. This additional assistance is provided on a case-by-case basis based on the needs of claimants.

Sharing of information on training and education programs and materials is a key strategy to support ES staff in their abilities to make appropriate referrals for claimants. ES staff communicates with training and education partners to determine current training and education opportunities and minimum requirements for claimants to participate in those opportunities.

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.*

Agriculture data from prior and current program years continue to be the foundation of this program plan to provide Wagner-Peyser funded services and activities to the agricultural community under the one-stop delivery system. Proteus, Nebraska's National Farmworker Jobs Program grantee, reports that the main needs of MSFWs are housing and food. Housing is a challenge in rural areas of Nebraska, particularly for farmworkers with limited income who require affordable housing. The expedited SNAP benefits process is promising; however, some Nebraska migrant farmworkers are not in the same place week-to-week thus limiting access. In addition to those basic needs, Nebraska MSFWs also require language acquisition and occupational skills training. Both needs significantly affect the end goal of job placement for the MSFW population. In addition to language acquisition, the needs of Nebraska's MSFWs center on skills attainment, which can be addressed with training assistance and permanent employment opportunities that match the available skills sets of the MSFWs. A cultural connection and sense of belonging is a common need for MSFWs. The limited presence of individuals with similar cultural backgrounds that settle in Nebraska communities where MSFWs settle can be offset through community engagement and educational opportunities. Education beyond occupational skills training is also a need. Basic literacy training is a common need among MSFWs, many of whom have limited reading and writing ability in their native languages as well as English.

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*

1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity

Table 38. Top five labor-intensive crops; months of heavy activity; geographic area of prime activity

Crops	Months of activity	Geographic area
Alfalfa	May – October	Statewide
Dry beans	May – October	Western Nebraska
Sugar beets	April – October	Panhandle of Nebraska
Fruits and vegetables	April – October	Eastern Nebraska
Corn	April – October	Statewide

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)

Nebraska's agricultural employers are expressing a need for more agricultural workers. While there is still a need for some handwork in the fields, the majority of agricultural employers' labor needs are for agricultural equipment operators, including combine and tractor operators, fertilizer transporters, and grain hauling to storage facilities. During the 2019 peak season, there were 1,657 H-2A workers. Each year the number of employers requesting H-2A workers increases, with the largest need being additional workers in the southwest region of the state.

3) Identifying any economic, natural, or other factors that are affecting agriculture in the state or any project factors that will affect agriculture in the state

Several factors are affecting agriculture in Nebraska, including mechanization, herbicide resistant weeds, and increases in fruit and vegetable production. Automation and changes in planting techniques and weed control have drastically reduced the need for MFSWs in some areas of the state for crops like sugar beets and potatoes, which have traditionally required handwork. Row planting for some crops has been replaced by the drilling method of planting, which provides closer spacing of the plants and makes the application of chemicals to control weeds more effective, thereby reducing the need for hand weeding and hoeing efforts. However, Proteus and Nebraska Extension Educators have expressed that some weeds are now proving resistant to herbicides, which has increased the need for hand hoeing of weeds in some parts of the state.

According to the Nebraska Department of Agriculture, the number of Nebraska's fruit and vegetable growers has increased over the past decade from 78 in 2000 to more than 600 in recent years. Most produce growers remain small family farm operations, and it is difficult to estimate how many employ seasonal workers who are not family members.

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*

Most migrant farmworkers in Nebraska are from Texas, Florida, Colorado, California, Georgia, Missouri, and Kansas. The primary language spoken by migrant farmworkers is Spanish. Proteus estimates that there are approximately 1,000 migrant farmworkers in Nebraska through the peak season and 250 *migrant* farmworkers during the low season. According to the 2017 Agricultural Census, agricultural employers employed 1,048 migrant farmworkers in Nebraska.

Estimating the number of seasonal farmworkers proves far more difficult in a state where agricultural employment still accounts for twenty-five percent of employment opportunities. According to the 2017 Agricultural Census, agricultural

employers reported employing 24,553 workers for less than 150 days. There is mostly likely significant duplication in this count; it is almost guaranteed that both migrant and seasonal farmworkers were employed by more than one agricultural employer. There were only 81 seasonal farmworkers registered in NEworks as of the last program year (Program Year 2018). However, the use of NEworks is traditionally limited for this population given their limited access to technology and limited English skills. The common populations for MSFWs are seasonal and year-round farmworkers, with migrant workers making up a smaller portion of MSFWs in the state. The peak season for MSFWs in the state is May through October annually, with low seasons occurring in the late fall through early spring (November – April).

4. *Outreach Activities*

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

Nebraska's outreach activities are described below in sections A through E.

A. *Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices*

ES staff data mines information in NEworks to identify MSFWs and proactively conducts outreach to offer and promote permanent employment opportunities. ES also partners with Proteus to provide information and conduct workshops for their MSFW customers. Other outreach efforts include:

- identification of community organizations that may come into contact with MSFWs:
  - churches with Spanish mass;
  - migrant Head Start programs;
  - libraries;
  - community-based organizations;
  - service agencies;
  - Proteus; and
  - Legal Aid;
- identification of businesses that may have contact with MSFWs, such as ethnic markets, laundromats, restaurants, motels, and salons.

Available resources for the MSFW outreach include an MSFW brochure and MSFW information bulletin. In addition to these state-developed materials, AJCs, other one-stop centers, and outreach staff provide information on local resources designed for the MSFW population. Outreach workers encourage MSFWs to go to the nearest AJC or other one-stop center for services. If the MSFWs cannot or do not wish to access services at AJCs or other one-stop centers, outreach workers provide onsite assistance with preparation of applications, assistance in obtaining referrals to specific employment opportunities, guidance in the preparation of complaints, referral to supportive services, and help in making appointments and arranging transportation. In all case, when appropriate, bilingual staff is available to conduct outreach activities.

B. *Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.*

Technical assistance (TA) is provided to outreach workers through in-person trainings, prior to the beginning of the peak season and through regularly scheduled technical conference calls and video conferences with local outreach staff during the peak MSFW season. MSFW partners will be invited to in-person trainings conference calls, including Proteus, the Nebraska Department of Education Migrant Education Program, and Legal Aid. Training topics will include the Complaint System, farmworker rights, best practices for outreach, and the Agricultural Recruitment System. TA calls throughout the season will refresh outreach workers' knowledge about the complaint system, supportive services, and partner programs and serve as an opportunity for outreach workers to ask questions and share best practices. The final TA call at the end of the season recaps success stories and opportunities identified for the

following year. Resources are provided to outreach workers for their incorporation into their MSFW outreach practices.

C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues

ES staff partner on a regular basis with the UI program in order to serve customers in an informative manner about the availability services and eligibility issues. This same knowledge is leveraged by staff when outreaching to and serving MSFWs. The UI program is integrated into mandatory annual training for ES staff. UI supervisors prepare and conduct training to educate ES staff on how to identify potential UI eligibility issues. ES staff is also trained on the process for reporting potential issues to UI using the ERF mentioned above, a document that identifies the potential eligibility issue. Written guidance for the ERF is developed in partnership with and reviewed by UI. This guidance is included in staff program manuals. Referrals regarding potential issues are provided to UI staff for adjudication. The referral process involves emailing the ERF to UI staff to identify and adjudicate the potential issue.

ES staff works directly with the NFJP grantee, Proteus, and the Nebraska Department of Education Migrant Education Program to find and reach MSFW populations in order to share directly information about ES, including the ES complaint system. ES staff partner with local and regional advocacy groups, such as the Nebraska Appleseed Center for Law in the Public Interest and Legal Aid of Nebraska, to share and disseminate information to farmworkers about their rights. In addition, MSFW outreach staff seeks out advocacy groups and partners when promoting ES services for MSFW populations. During partnership development, outreach staff will request printed and electronic materials to share with other partners and promote to MSFWs directly, in order to inform them of services and agencies intended to serve and assist MSFWs.

D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers

ES conducts monthly TA video conferences with ES staff to provide tools and resources to equip staff with determining and meeting the needs of job seekers and employers. Topics include changes in state or federal regulation, updated features and training within NEworks, and implementation of quality assurance requirements. In addition to monthly TA video conferences, there are regular in-service training opportunities conducted throughout the year to share new or updated information and best practices. Examples of in-service training include attending relevant state and federal roundtables or conferences, enrollment in State of Nebraska professional development courses and leadership programs, and other emerging professional development opportunities. ES is constantly looking for innovative ways to train staff and provide them new resources.

E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups

ES partners across the state with Proteus, Nebraska's NFJP grantee. After completion of competitive bidding processes, Proteus and the Nebraska Department of Labor signed an MOU on February 5th, 2019 which outlines the partnership. The MOU ensures collaborative outreach to migrant and seasonal farmworkers (MSFWs) is successful to address barriers to employment and the provision of supportive services. The agreement expresses the joint willingness to work cooperatively and expeditiously to assure maximum services and outreach to MSFWs, combine resources and knowledge for more efficient service delivery and outreach, coordinate and exchange information to meet the unique needs of MSFWs, and the ongoing process for the SMA to receive input on improving communication with the American Job Centers (AJCs), One-Stop Centers, and all other workforce partners to provide more effective coordination of services to MSFWs in such areas as outreach, referrals, complaints, access to career pathways, job training, outreach worker contacts, job referrals, and other supportive services.

Proteus is collocated in some AJCs and other one-stop centers and has access to services available across the state, even where they do not have a physical presence in AJCs or other one-stop centers. ES and Proteus staff partner at administrative, management, and staff levels, designing partnership opportunities that are appropriate for each community or region based on the needs of the current MSFW population.

Concentrated outreach is undertaken during the peak periods of MSFW activity, typically May through October. Outreach workers, in coordination with Proteus, maintain a record of outreach activities that includes the names of MSFWs. These records are especially utilized when an application is taken, referral to a job is made, or a complaint is documented. This data is retained and preserved through the NEworks, Nebraska's management information system. NEworks allows the Nebraska Department of Labor (NDOL) to track the number of MSFWs

contacted, any follow-up contacts that are made, and the types of services provided. This information is provided to the US Department of Labor Employment and Training Administration in the quarterly "Services to Migrant and Seasonal Farmworker Reports" (Form 5148, LEARS Reporting System).

To assist with outreach, NDOL has developed a brochure detailing available services needed by MSFWs. The brochure is available in Spanish and English. The brochure is an important resource for direct outreach and connecting with programs serving the MSFWs that are collocated at AJCs and other one-stop centers, as well as other programs and agencies serving MSFWs. The three most important resource partners for MSFWs in Nebraska are the Nebraska Department of Education migrant program, migrant health programs, and Proteus, Nebraska's NFJP grantee. Coordination among these partners will continue to be of special importance to Nebraska's Wagner-Peyser Employment Service.

5. *Services provided to farmworkers and agricultural employers through the one-stop delivery system*

Describe the State agency's proposed strategies for:

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

How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers

How the State serves agricultural employers and how it intends to improve such services

Career and training services

MSFW outreach activities are coordinated primarily through Nebraska's one-stop delivery system. Dedicated state merit staff who meet the requirements set forth in 20 CFR § 653.107 cover each region of the state are responsible for conducting outreach to employers and MSFWs in their surrounding areas of service. Utilization of a common case management system and Title I adult program case managers is a key strategy in providing MSFW populations with WIOA Title I employment and training services. Utilizing the same state merit staff to conduct MSFW outreach and Title I adult program case management will allow staff to build relationships, identify needs and barriers, and provide continuous and comprehensive services through the Title I adult program. In local areas where WIOA Title I program services are contracted, MSFW outreach workers will maintain relationships with MSFWs and the contracted Title I case managers to increase the likelihood of MSFW program participation and success.

Serving agricultural employers

Agricultural employers receive services from ES staff. ES services include posting of open positions in NEworks, recruitment of job seekers, hosting of job fairs, sharing open positions with partner organizations, and access to training services, such as Nebraska's state-funded Worker Training Program, which provides incumbent workers with the training necessary to be successful on the job. However, Nebraska has never taken a focused approach with agricultural employers despite the need. NDOL will leverage its existing partnerships with Proteus, the Nebraska Department of Education Migrant Education Program, and Legal Aid of Nebraska to identify agricultural employers and their needs as they relate to employment and training. By leveraging existing partnerships with organizations that agricultural employers trust, NDOL anticipates an increase in the usage rate of employer services and additional WIOA Title I services in ways that benefit both the employer and MSFWs.

B. *Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups*

MSFW outreach activities involve the provision of information about the ES Complaint System and a summary of farmworker rights with respect to employment. The ES Complaint System is also shared on the Nebraska Department of Labor's Labor Standards web page and with MSFW partners, AJCs, other one-stop centers, and farmworker advocacy groups, including Legal Aid of Nebraska and Nebraska Appleseed. ES outreach staff and partners receive biannual training regarding the ES Complaint System.

C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

MSFW outreach workers and business services representatives will market the Agricultural Recruitment System to agricultural employers, including Farm Labor Contractors. By April 2020, MSFW outreach workers and business service representatives will be trained on how the Agricultural Recruitment System (ARS) functions, allowing them to explain the benefits of advertising job openings in Nebraska's agricultural worker supply states. In addition, staff will be provided with marketing resources advertising ARS. As part of monthly technical assistance calls, MSFW outreach staff will discuss best practices for reaching agricultural employers to share with business service representatives throughout the state during their monthly TA calls. Subsequent training will be ongoing and additional resources provided as necessary and as requested.

6. Other Requirements

A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

Proteus and NDOL entered into a collaborative agreement, which includes information about reporting apparent violations, and development of partnership and training opportunities across agencies, as well as signatures of both Proteus and Nebraska's State Monitor Advocate. The agreement was finalized and signed by all parties in February 2019. In addition, by April 2020 collaborative agreements will be established between the Nebraska Department of Education Migrant Education Program and Legal Aid of Nebraska. By June 2020, collaborative agreements will be established between other statewide MSFW service partners such as, Migrant Health, SNAP Outreach, and Nebraska Appleseed.

At the local level, ES staff meets with partner agencies at least quarterly. The local partner meetings include representatives from Proteus, other local one-stop center partners, and other local service providers, which may include the Nebraska Department of Education Migrant Education Program. As collaborative agreements are established statewide, local partnership meetings will be encouraged and strengthened.

In January 2018, NDOL began state-level monthly meetings with Legal Aid of Nebraska, Proteus, and Nebraska Department of Education Migrant Education Program to coordinate services for Nebraska's MSFWs. Subsequent meetings included the SNAP Outreach program and the Salvation Army's SAFE-T program, which assists human trafficking survivors and works to combat human trafficking in Nebraska. Further, MSFW partners are eager to provide occupational safety training programs to MSFWs and employers, cross training for outreach staff from all programs throughout the state, and the development of a MSFW needs assessment. Additional collaborative projects and agreements will be developed as needs arise.

B. Review and Public Comment

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

Nebraska's AOP was provided to Proteus, Nebraska's NFJP grantee, for review on December 18, 2019 prior to publication for public comment. The AOP was published for public comment by the Nebraska Department of Labor (NDOL) on January 30, 2020, with the publication of this plan, and made available to Nebraska's NFJP grantee (Proteus), public agencies, agricultural employer organizations, and other organizations. A 30-day public comment period was provided. No public comments were received regarding the AOP. To further the involvement of Proteus,

public agencies, agricultural employer organizations, and other organizations in the execution of Nebraska's AOP additional actions have been taken.

Proteus and NDOL entered into a collaborative agreement, which includes information about reporting apparent violations, and development of partnership and training opportunities across agencies, as well as signatures of both Proteus and Nebraska's State Monitor Advocate. The agreement was finalized and signed by all parties in February 2019. In addition, by April 2020 collaborative agreements will be established between the Nebraska Department of Education Migrant Education Program and Legal Aid of Nebraska. By June 2020, collaborative agreements will be established between other statewide MSFW service partners such as, Migrant Health, SNAP Outreach, and Nebraska Appleseed.

At the local level, ES staff meets with partner agencies at least quarterly. The local partner meetings include representatives from Proteus, other local one-stop center partners, and other local service providers, which may include the Nebraska Department of Education Migrant Education Program. As collaborative agreements are established statewide, local partnership meetings will be encouraged and strengthened.

In January 2018, NDOL began state-level monthly meetings with Legal Aid of Nebraska, Proteus, and Nebraska Department of Education Migrant Education Program to coordinate services for Nebraska's MSFWs. Subsequent meetings included the SNAP Outreach program and the Salvation Army's SAFE-T program, which assists human trafficking survivors and works to combat human trafficking in Nebraska. Further, MSFW partners are eager to provide occupational safety training programs to MSFWs and employers, cross training for outreach staff from all programs throughout the state, and the development of a MSFW needs assessment. Additional collaborative projects and agreements will be developed as needs arise.

C. Data Assessment

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

- Program Year 2015: met MSFW goals for Wagner-Peyser Employment Service
- Program Year 2016: met MSFW goals for Wagner-Peyser Employment Service
- Program Year 2017: did not meet MSFW goals for Wagner-Peyser Employment Service
- Program Year 2018: did not meet MSFW goals for Wagner-Peyser Employment Service

In Program Year 2017 and the first two quarters of Program Year 2018, MSFW services were not managed by NDOL's Officer of Employment and Training but NDOL's Legal Division. This resulted in a lack of coordination with farmworker advocacy groups, WIOA Title I staff, and MSFW outreach staff. Because of this lack of coordination, identifying and providing services to this population was limited and not as focus. NDOL made the decision during the third quarter of Program Year 2018 to move MSFW outreach and services to the Office of Employment and training for full integration with WIOA Title I and III services and programming. During the third and fourth quarters of Program Year 2018, developing new protocols, procedures, and partnerships with farmworker advocacy organizations were developed to ensure the MSFW population is served equitably when compared to the general ES participant population. During the fourth quarter of Program Year 2018, a State Monitor Advocate (SMA) within was appointed from within the Office of Employment and Training to ensure compliance and performance goals are achieved in relation to the MSFW population. During the first and second quarters of Program Year 2019, MSFW outreach staff were identified and provided training, along with their managers, regarding new outreach requirements, documents, strategies, and goals. Quarterly file review began in the first quarter of Program Year 2019, and regular onsite visits by the SMA will begin during the third quarter of Program Year 2019 to ensure compliance. NDOL and the SMA will regularly monitor compliance and performance to ensure equitable services are being provided to the MSFW population.

D. Assessment of Progress

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Since the previous AOP was written, many achievements have been made in relation to MSFW outreach collaborations and partnerships. MSFW outreach achievements have also been made in relation to expanded TA, including TA provided to NDOL leadership, the SMA, and MSFW outreach staff, as well as farmworker advocacy organizations throughout the state. However, during a Federal review conducted by the US Department of Labor in August 2019, many gaps were identified. Those gaps included a lack of state merit staff who met the requirements of 20 § CFR 653.107 completing MSFW outreach and a failure to monitor MSFW services according to regulation. By November 2019, NDOL identified and trained MSFW outreach workers who do meet regulatory requirements. The newly appointed SMA completed the first Program Year 2019 quarterly review of MSFW outreach efforts. Quarterly review of performance by the SMA will continue, along with regularly scheduled onsite visits to regional one-stop centers to ensure they are providing services equitably to MSFWs in their regions.

E. State Monitor Advocate

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The SMA reviewed and approved the AOP.

Wagner-Peyser Assurances

The State Plan must include assurances that:

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));	Yes
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;	Yes
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 Title I; and	Yes
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.*	Yes

Wagner Peyser Program Performance Indicators

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	73.0%	73.0%	73.0%	73.0%
Employment (Fourth Quarter After Exit)	73.0%	73.0%	73.0%	73.0%
Median Earnings (Second Quarter After Exit)	$5,800	$6,300	$5,800	$6,300
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 piloted and this data will not be entered for 2020 State Plans.*

Program-specific Requirements for Adult Education and Family Literacy Act Programs

a. Aligning of Content Standards

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

Nebraska Adult Education has adopted the College and Career Readiness Standards for Adult Education https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf; as well as the English Language Proficiency Standards for Adult Education https://lincs.ed.gov/publications/pdf/elp-standards-adult-ed.pdf. Nebraska Revised Statute 79-760.01 requires the Nebraska State Board of Education to "adopt measurable academic content standards for at least the grade levels required for statewide assessment." Those standards shall cover the subject areas of reading, writing, mathematics, science, and social studies, and the State Board of Education shall develop a plan to review and update standards for those subject areas every seven years.

With the adoption of the national standards for Adult Education, the Nebraska Department of Education, as the State Eligible Agency for federal funding under the Adult Education and Family Literacy Act (WIOA Title II), has aligned Adult Education standards with those for at least the grade levels required for statewide assessment. The standards contained in the College and Career Readiness Standards for Adult Education and English Language Proficiency Standards for Adult Education meet or exceed those adopted by the State. Providers receiving Title II funding are required to utilize curriculum that align with the standards, thus ensuring that students gain the knowledge identified in the standards. Each provider, upon receipt of funding, is required to submit a curriculum alignment certification to the State Office. Local providers work closely with curriculum vendors to ensure compliance.

b. Local Activities

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

Adult education and literacy activities (Section 203 of WIOA)

- *Adult education;*
- *Literacy;*
- *Workplace adult education and literacy activities;*
- *Family literacy activities;*
- *English language acquisition activities;*
- *Integrated English literacy and civics education;*
- *Workforce preparation activities; or*
- *Integrated education and training that—*
    1. *Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and*

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

Special Rule. Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

Nebraska Adult Education awards multiyear grants, on a competitive basis, to eligible providers to develop, implement and improve adult education and literacy activities within the State. An eligible provider must be an organization that has demonstrated effectiveness in providing adult education and literacy activities. These organizations may include: a local education agency; a community-based organization or faith-based organization; a volunteer literacy organization; an institution of higher education; a public or private nonprofit agency; a library; a public housing authority; a non-profit institution that is not described and has the ability to provide adult education and literacy activities to eligible individuals; a consortium or coalition of the agencies, organizations, institutions, libraries or authorities described; and a partnership between an employer and an entity described.

Nebraska Adult Education requires that each eligible provider receiving a grant use the grant funding to establish and operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently.

All applicants for federal funding under WIOA Title II are required to submit a grant application that includes a written narrative on how the applicant meets the considerations identified in WIOA Section 231(e). Responses provided in the application are reviewed and scored by an established review committee, using a published rubric. Grant applications are also submitted to each local workforce board for a review of consistency with the local plan and to provide the workforce board an opportunity to make recommendations to Nebraska Adult Education to promote alignment with the local plan. Recommendations made by the local board will be considered by Nebraska Adult Education in determining the extent to which the application addresses the required considerations in Section 231(e) of WIOA.

Nebraska Adult Education provides a wide variety of activities to meet the needs of adult learners. All activities provide a foundation of English language acquisition for non-native English speakers, basic skills improvement and adult secondary education for adult learners who do not have a secondary school diploma or recognized equivalent. Instruction may include the following:

- Math;
- Reading;
- Writing
- Science;
- Social Studies;
- Language Arts;
- Civics Education;
- Use of Technology

All adult learners enrolled in Nebraska Adult Education receive a career pathways intake, which includes an interview to help instructors identify the mid and long-term goals of the student. Transition plans focus on postsecondary education, training programs and employment opportunities.

Nebraska Adult Education also supports family literacy activities that are of sufficient intensity and quality, to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children's learning needs, and that integrate:

- Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement and economic self sufficiency
- Interactive literacy activities between parents or family members and their children

- Training for parents for family members regarding how to be the primary teacher for their children and full partners in the education of their children
- Age appropriate education to prepare children for success in school and life experiences

Nebraska's Integrated English Literacy and Civics Education activities provide services for English language learners who are adults, including professionals with degrees and credentials in their native countries. Such services are delivered in combination with integrated education and training, which focus on a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of education and career advancement.

Workforce preparation activities are designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills and self-management skills. Providers focus on improving an adult learner's competency in utilizing resources and information for educational and career advancement, learning to work effectively with others and skills that are focused on increasing an individual's ability to successfully enter the workforce and maintain consistent employment. With a focus on career pathways at intake, adult learners prepare for successful transition to postsecondary education and training opportunities and employment.

Per WIOA Section 203(4), Nebraska Adult Education serves only eligible individuals-

(A) who have attained 16 years of age;
(B) who are not enrolled or required to be enrolled in secondary school under State law; and
(C) who-
(i) are basic skills deficient;
(ii) do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
(iii) are English language learners.

c. Corrections Education and other Education of Institutionalized Individuals

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

- *Adult education and literacy activities;*
- *Special education, as determined by the eligible agency;*
- *Secondary school credit;*
- *Integrated education and training;*
- *Career pathways;*
- *Concurrent enrollment;*
- *Peer tutoring; and*
- *Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.*

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Nebraska Adult Education providers choosing to serve adult learners in a correctional setting will apply for section 225 funding through a separate application during an open competition. Programs receiving section 225 funding to serve adult learners in the State's correctional institutions must establish programs that provide:

- Adult education and literacy activities based on the adult learners educational functioning level determined through assessment;
- English language acquisition activities for adult learners who are non-native English speakers;
- A career pathways intake and interview to determine the mid- and long-term goals of adult learners, including transition to postsecondary education, job training and employment upon release;
- Concurrent enrollment while incarcerated;

- Transition to re-entry initiatives and other post release services in cooperation with State partners; and
- Other services offered by the correctional agency.

Nebraska Adult Education shall use not less than 82.5 percent of the grant funds to award grants under section 231 and to carry out section 225, of which not more than 20 percent of such amount shall be available to carry out section 225.

Nebraska Adult Education providers receiving section 225 funding are required at the time of application, to identify how the provider will prioritize service to individuals who are likely to leave the correctional institution within 5 years of participation in the program.

d. Integrated English Literacy and Civics Education Program

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

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

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

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

Nebraska Adult Education will continue to fund programs under section 243. Providers receiving section 243 funding will establish and operate programs and activities that serve English language learners who are adults including professionals with degrees and credentials in their native countries. Activities will include adult education and literacy services and will be delivered in combination with integrated education and training activities.

All English language learners served under section 243 will receive instruction in English language acquisition focusing on English oral communication improvement, as well as reading, writing and comprehension skills in English and mathematics. Adult learners under this section will also receive instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.

Nebraska Adult Education will make funds available under Section 243 through a competitive application process and will award multiyear grants to eligible providers within the State to enable the eligible provider to develop, implement and improve adult education and literacy activities, in combination with integrated education and training activities.

Nebraska Adult Education will continue to ensure that Integrated English Literacy and Civics Education program activities are integrated with the local workforce development system and its functions. Local program providers are encouraged to work with their local workforce development board to assist in identifying and aligning educational and career services to meet the needs of their local and regional area.

In the development of their Integrated Education and Training (IET) program, local program providers are required to, with the support of their local workforce development system, align each program to their local area's priority workforce sectors, demonstrate demand for employment in their local labor markets and establish that the employment leads to economic self-sufficiency for participants.

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*

Nebraska Adult Education will continue to prioritize the coordination of services and the promoting of partnerships. This includes regular meetings with WIOA partners at the State and local levels. Students will be served by partners concurrently, but without duplication.

WIOA continues to transform Nebraska Adult Education with a career pathways focus supported by College and Career Readiness Standards. The statewide career pathways intake process is a required component of program enrollment and orientation activities. Students are prepared to consistently keep their end-goal in sight.

Career pathways are supported with referrals to partners both concurrently and as the student transitions. Consistent assessments across core programs allows for a streamlined approach to serving students. Utilizing the same assessment tool allows for unifying goals, coordinating progress and eliminating duplication.

Nebraska Adult Education relies on multiple methods to deliver high-quality professional development activities across the state. These methods will continue and include; utilization of a small cohort model with a train-the-trainer approach, online training programs, face-to-face trainings, web-based meetings and conference calls and attending both State and National conferences. Nebraska Adult Education will continue to partner with content experts to deliver training opportunities to eligible providers.

Technical assistance activities to eligible providers have been established to ensure compliance under the Act, but also to improve instructional outcomes that benefit students. Nebraska Adult Education will continue to modify and update technical assistance to meet the needs of both students and providers. Desktop monitoring of student outcomes and data provides the State with the ongoing opportunity to identify areas of improvement, thus ensuring compliance.

Nebraska Adult Education, with guidance from the Office of Career, Technical and Adult Education, has recently updated its monitoring and evaluation of all eligible providers across the State. The State monitoring plan will consist of on-site, targeted and desktop monitoring of providers. Routine communication with directors and program staff help ensure understanding and compliance under Title II.

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

Nebraska Adult Education is committed to providing resources, training and assistance to ensure adult learners across the State have access to quality instruction, to improve English language acquisition, basic skills and preparedness for high school equivalency examinations.

Distance Education continues to be an integral part of Nebraska Adult Education. With the large rural areas, this form of learning provides access to a wider population of adult learners, especially those who are unable to travel regularly to a class site.

The State will take a proactive approach to improving outcomes for the primary indictors of performance described in section 116. Policies and procedures to improve exit-based outcomes will be disseminated to eligible providers. Training will be conducted across all programs with the expectation that eligible providers will take an active role in improving performance outcomes.

With established employer-partner models, Nebraska Adult Education will support efforts at the local level to promote and establish new partnerships that integrate adult education and literacy activities, as well as English language instruction with occupational skill training at employer sites. A strong focus on workplace adult education and literacy activities is paramount to the success of Title II as a core partner.

f. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Nebraska Adult Education has an established process to assess and evaluate providers of adult education across the State. Nebraska Adult Education will also continue to provide ongoing technical assistance and professional development necessary to ensure improvement and compliance.

Professional development is evaluated with a multi-faceted approach. Evaluation surveys, feedback solicited both informally and formally, as well as targeted evaluation of training results through data analysis are all used to assess the quality of professional development opportunities. Training needs are assessed and suggested through specific questions on quarterly reports, self-assessments, data quality checklists, data analysis, and direct communication as well as noted through desk-top and on site monitoring. Professional development opportunities are selected to address these needs utilizing the best available research and are evaluated to determine the extent that the need was met. Data

analysis of outcomes ensures the intent of training is reached by enhancing student performance. Evaluations inform the need for and selection of further professional development opportunities.

Assessment and Monitoring Processes:

- Risk Assessment- A detailed annual risk assessment is conducted on each eligible provider to identify needs for monitoring, technical assistance and professional development.
- Self-Assessment- Each provider conducts a self-assessment to identify strengths as well as needs for technical assistance and professional development.
- Quarterly Reports- Each provider will submit reports quarterly to monitor progress towards attainment of performance targets, analyze data regarding the previous quarter, as well as identify barriers and training needs.
- Data Quality Checklist- A checklist designed to monitor data and ensure the accuracy of the information entered in the National Reporting System management information system will be conducted annually for each provider.
- Desktop Monitoring- Continual monitoring of reports in LACES will allow the State Office to track performance as well as the accuracy of data.
- On Site Monitoring- Monitoring protocol allows the State to review programmatic information through interview, reviewing materials, as well as direct observation.
- Program Improvement Plan- As issues are identified, providers are required to submit program improvement plans to address issues and identify strategies for improvement.
- Corrective Action Plan- Findings that are identified through monitoring will be addressed by requiring the program to submit a corrective action plan that identifies the finding and the plan for resolution including the timeline.
- Technical Assistance- Technical assistance will be provided to address any needs identified through these evaluative processes.
- Professional Development- Targeted professional development on best practices to ensure quality will be provided on an ongoing basis both virtually as well as face-to-face. The selection and evaluation of trainings will be focused on the end user: the improvement of services provided for and by the instructor and the impact on the student's performance.

Adult Education and Family Literacy Act Program Certifications

States must provide written and signed certifications that:

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 authority to submit the plan;	Yes
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 assurances that:

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"	Yes

The State Plan must include	*Include*
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;	
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

Certification regarding lobbying

CERTIFICATION FOR CONTRACTS, GRANTS, LOANS, AND COOPERATIVE AGREEMENTS

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,00 0 and not more than $100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to wioa@ed.gov at the same time you submit your State Plan via the portal.

1. *SF424B - Assurances – Non-Construction Programs (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)*
2. *Grants.gov - Certification Regarding Lobbying (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)*
3. *SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)*

APPLICANT'S ORGANIZATION	*Enter information in this column*
Applicant's Organization	Nebraska Department of Education
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	*Enter information in this column*
First Name	Matthew
Last Name	Blomstedt, Ph.D.
Title	Commissioner of Education
Email	Matt.Blomstedt@nebraska.gov

Section 427 of the General Education Provisions Act (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions posted at https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc.

Nebraska Adult Education at the Nebraska Department of Education, serving as the State Eligible Agency (SEA) for WIOA Title II funding, Adult Education and Family Literacy Act, ensures that all students, teachers and program participants with barriers will have equitable access to enroll in and participate in Adult Education programs across Nebraska. All eligible providers receiving funds under the Act are required to submit a General Education Provisions Act (GEPA) Attestation form on an annual basis to Nebraska Department of Education. Included in this Attestation is:

- The eligible provider's determination whether any barriers included in the statute may prevent students, teachers etc. from such access or participation in, the federally-funded project or activity; and-
- A succinct description of how the eligible provider will address any barriers that are applicable to circumstances that arise.

Nebraska Adult Education ensures equitable access is provided to all adult learners, teachers, programs and stakeholders through monitoring.

The Nebraska Department of Education continuously evaluates State Leadership activities to ensure full equitable access to training and professional development in a variety of platforms, delivery formats and follow-up access via the web. Administrative activities ensure that all stakeholders are given equitable access through a partnership with our subrecipient providers. Through this partnership, an ongoing evaluation process exists to avoid access barriers for all sponsored activities.

The Office of Adult Education at the Nebraska Department of Education has a process in place to continuously monitor all expenditures, both local program level and State level to ensure full compliance.

Adult Education and Literacy Program Performance Indicators

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	58.5%	58.5%	61.8%	61.8%
Employment (Fourth Quarter After Exit)	55.5%	55.5%	58.6%	58.6%
Median Earnings (Second Quarter After Exit)	$5530.00	$5530.00	$5837.00	$5837.00
Credential Attainment Rate	33.5%	33.5%	35.4%	35.4%
Measurable Skill Gains	38.0%	42.0%	39.0%	42.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

Program-Specific Requirements for Vocational Rehabilitation (Combined or General)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA: [13] Sec. 102(b)(2)(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 State Rehabilitation Council (SRC) is made up of individuals from across the state that have an interest in working with Nebraska VR to ensure the needs of Nebraskans who experience a disability are being met in the most effective and efficient manner possible. Council members review, analyze, and advise Nebraska VR regarding the agency's performance. They also help develop, agree to, and review the agency's goals and priorities. The Council meets quarterly and is composed of 3 subcommittees: Client Services, Employer, and Transition. Each SRC member selects a subcommittee to participate in based on their interests and background. These committees provide the Council members the opportunity to provide feedback on topics relevant to their individual group.

SRC annual events: (1) Entrepreneur of Distinction Awards: The SRC selected and recognized Nebraska VR clients who were successful in their self-employment ventures. (2) Annual outreach to the State Senators to provide information about Nebraska VR.

- **The Client Services Committee** reviewed and analyzed the Client Satisfaction Survey results. The Committee monitored the number of surveys completed, percentage still employed, reasons why clients are no longer employed, does the job meet their current needs, what service did VR provide that was most helpful, and are clients very likely or somewhat likely to recommend VR to a friend or family member. Some recommendations suggested for the survey are (1) contact with a VR Office Director and/or the Client Assistance Program when concerns are reported while the survey is being completed and (2) monitor the number of "Other" answers by adding additional choices on the survey, and (3) revise the client satisfaction surveys to get more detail as to why jobs ended. The Committee evaluated the year end survey report and identified any possible trends. The Committee also recommended to the Client Assistance Program the Consumer Input Committee be reactivated so Nebraska VR could use this format to obtain immediate feedback on any agency policy and procedures.
- **The Employer Services Committee** selected the Entrepreneur of Distinction Annual Award winners, discussed and provided feedback on VR job placement services, job seeking training, Certificate Programs and Project SEARCH. The committee recommended improvements that could be made to the Business Advisory Council by building awareness and meeting on a more regular basis. The Committee also reviewed the retention process/questions staff must follow when working with employers and offered suggestions, clarification and combination of some questions regarding accommodations, employer language and

immediate risk of losing the job. Information was shared regarding the Project SEARCH Pre-Employment Transition Services Job Fair. The Committee provided feedback about partnerships with businesses and Project SEARCH sites. The Committee engaged in discussion about defining the award criteria and a nomination form for the Disability Employment and Inclusion Awards. The Committee offered recommendations for recruitment of additional business representatives for the SRC.

- **The Transition Committee** focused on policies and procedures relating to high school aged students and families including discussions on Pre-Employment Transition Services as defined in WIOA. The Committee reviewed feedback from the summer transition programs. Feedback from VR staff who were invited to attend Individualized Education Program (IEP) meetings was also addressed. Additionally, there were discussions regarding (1) current progress and challenges in transition services, (2) collaboration with Parent Training and Information Center, (3) strategies to improve transition assessments, (4) survey results with teachers and school staff, and (5) outreach and training for the schools. The SRC provided feedback and supported combining the VR Adult and Transition Workbooks that explore client interests, assets, work history, and employment needs used to develop the Individualized Plan for Employment. The SRC recommended adding Benefits Analysis to the booklet and provided feedback and suggestions to make the VR Transition pamphlets more user-friendly language by eliminating VR terminology.

Written reports are submitted at each meeting for the Council to review from the Nebraska Youth Leadership Council, Client Assistance Program, Assistive Technology Partnership, VR Ombudsman, Deaf and Hard of Hearing Committee, and the Nebraska Statewide Independent Living Council.

SRC members provided additional input on many issues including: entering into an Order of Selection (OOS), closing all priority groups, removal of individuals off the wait list in Priority Group 1, the importance of job retention services, support of the Needs Assessment Survey, suggestions for questions, and who should receive the survey and pros and cons of a potential e-newsletter for individuals on the wait list. The SRC suggested VR explore opportunities to increase the number of Native Americans with disabilities being served. With the only Vocational Rehabilitation Services Project for American Indians with Disabilities in Nebraska no longer being funded, VR will approach other eligible tribes and organizations to apply for (American Indian Vocational Rehabilitation (AIVR) grants.

Nebraska VR went into an OOS on December 11, 2017. At that time, the VR Director summarized the funding of Nebraska VR and reviewed the OOS as discussed at prior Council meetings. The VR Director summarized the state/federal match that is utilized for VR funding and why Nebraska VR is now facing a situation where adequate resources are not available to meet the needs of all individuals requiring VR services. The VR Director discussed the four biggest costs of VR: case services, staff, indirect costs and rent costs and the impact of resource decisions for each area. The VR Director stated VR needs to go into an OOS to meet budget needs. Council members discussed the need to go into an OOS. The VR Director reviewed the three priority categories of an OOS. The VR Director shared the priority categories as follows: Priority Group 1 — individuals with severe physical or mental impairment resulting in a rating of very low in two or more functional areas. Functional areas include: mobility, communication, interpersonal skills, self-care, self-direction, work tolerance and work skills. Priority group 2 — an individual with severe physical or mental impairment resulting in a very low rating in one functional area. Priority group 3 — all eligible individuals. The VR Director then discussed the administration of the OOS. The VR Director shared they are currently gathering information to determine which priority groups will need to be closed. As part of the State Plan process, a VR agency can offer retention services, assist individuals who are in immediate risk of losing their job, and therefore, the individual can be considered a top priority and removed from the wait list. The VR Director suggested Nebraska VR choose that option as we do not want individuals losing jobs; sharing it is easier to keep individuals employed than to find new employment. The VR Director stated that in terms of administration they will monitor expenditures and revenue and every month a committee will review the agency's revenues and expenditures and determine how many individuals might be pulled off the wait list to receive services. Members discussed Council support of the necessity for an OOS. The VR Director reported the OOS will go into effect as soon as approval is received from RSA. VR has instated an immediate hiring freeze and will be eliminating as much discretionary spending as possible to maintain funds for case services. The VR Director shared that students in Pre-Employment Transition Services who are not currently receiving VR services will be placed on a wait list for VR services if they apply for and are determined eligible for VR services. They will continue to receive Pre-Employment Transition Services. The students who are currently receiving Pre-Employment Transition Services and are determined eligible for VR will continue to receive Pre-Employment Transition Services.

Chris Gaspari moved to support VR's proposal to RSA for an OOS, Gayle Hahn seconded the motion. There were no objections to the motion. The motion carried by unanimous consent.

The VR Director continued to update the SRC on the implementation of the OOS. At the April 23, 2018 SRC Executive Committee meeting, discussion was held on current obligations and expenditures. Although it was anticipated that case service expenditures would decline after closing Priority Groups 2 and 3 that was not the case. Therefore, in consultation with the SRC, the decision was made to close Priority Group 1 resulting in 3 out of 3 Priority Groups closed. The SRC Executive Committee was in agreement and supportive of the decision to close Priority Group 1.

During the regularly scheduled May 8, 2018 meeting, the VR Director provided an OOS update. The VR Director reiterated the justification for closing the Priority Groups and the on-going efforts to monitor the VR budget as well as continuous communication and collaboration with VR partners in support of the information and referral process.

The VR Director shared a leadership team was created with a representative from each office in October, 2018. The leadership team worked together to discuss providing quality services. This leadership team determined three (3) priorities: 1) improving and maintaining outreach procedures; 2) developing and appreciating staff; 3) establishing, developing, and improving community rehabilitation programs. Nebraska VR Leadership Council continued to implement and monitor progress of these priorities in PY 2018-19.

At the August, 2019 SRC meeting, the VR Director updated the Council on the OOS reviewing the state funding increase that became available July 1st. 300 individuals were removed from the wait list.

In the October, 2019 SRC meeting, the VR Director provided an update. VR was awarded the full amount requested for federal reallotment. With the reallotment, 1,000 individuals were removed from the wait list in October. There was an overview of VR staffing. Nearly 50 vacancies since implementing the OOS necessitated a review of filling these positions by capacity in each office in order to continue to aggressively remove individuals from the wait list.

During the development of the WIOA State Plan, the SRC Executive Committee and Council were consulted and provided an opportunity to comment. A summary of the comments provided by the SRC include:

- Goal 1: There were no additions.
- Goal 2: An SRC member asked how this would be measured.
- Goal 3: There were no additions.
- Goal 4: The SRC members asked that SRC and educators be included.
- Goal 5: There were no additions.

- Strategy 1: The SRC members asked that SRC and educators be included. It was suggested to identify rural as a specific strategy for job development and job coaches in the rural areas of Nebraska.
- Strategy 2: It was suggested to add the VR/ATP monthly meetings and VR is a member of the ATP Advisory Council.
- Strategy 3: It was suggested to add SRC and educators to the first bullet. It was suggested to add sign language interpreting to the second bullet. It was suggested to consider Trans-Act as a resource to the third bullet.
- Strategy 4: It was suggested to add as a bullet point, continued training for VR staff related to IEP development and participation in meetings.
- Strategy 5: SRC offered Family Employment Awareness Training (FEAT) as an example of this strategy.
- Strategy 6: There were no comments.
- Strategy 7: There were no comments.

2. The designated State unit's response to the Council's input and recommendations; and

The agency agreed with all the recommendations and will take or has taken necessary action to implement.

The SRC and Nebraska VR jointly agreed to the input and recommendations for the WIOA State Plan.

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

The agency did not reject any of the Council's input or recommendations.

b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. *A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;*

Nebraska VR is not requesting a Waiver of Statewideness.

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

N/A

3. *Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.*

N/A

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. *Federal, State, and local agencies and programs;*

Nebraska VR seeks to work cooperatively with numerous other state and local agencies and programs. Collaborative efforts are manifested through coordinated committees throughout the state with Nebraska VR state office and local field staff actively participating. Examples of the committees Nebraska VR serves on includes, but are not limited to: Nebraska Planning Council on Developmental Disabilities, State Advisory Council on Mental Health Services, Nebraska Special Education Advisory Council, Metro Regional Secondary Transition Project, Omaha Public School Superintendent Special Education Advisory Committee, Transition Practitioners Committee & Advisory Committee, Nebraska Brain Injury Advisory Council, Local Community Resource Committees**,** Association of People Supporting Employment First (APSE), Assistive Technology Partnership (ATP) Advisory Council, Alternative Finance Loan Advisory Council, Nebraska Children's Commission Juvenile Services Committee, Protection and Advocacy for Individuals with Mental Illness Advisory Council, Prevention Partnership with the Nebraska Children and Families Foundation, Autism Standing Committee, Autism State Collaborative, and local Chambers of Commerce.

Nebraska VR maintains interagency agreements with Nebraska Health and Human Services/Divisions of Developmental Disabilities and Behavioral Health, Nebraska Commission for the Blind and Visually Impaired, and Nebraska Department of Education/Special Education for purposes of providing an understood and coordinated effort to achieve employment goals for persons with disabilities.

Nebraska VR maintains written agreements with the following programs to coordinate efforts and services to assist persons with disabilities to achieve employment success. The following agencies represent various locations throughout the state and serve individuals experiencing disabilities such as severe and persistent mental illness, developmental disability, brain injury, autism spectrum disorders, and those experiencing multiple disabilities:

Abled Inc., Achievements Neb LLC, Angel Guardians Inc., Black Hills Works, Cirrus House, Inc., Community Alliance Rehabilitation Services, Community Alternatives Ne Inc., Community Options Individual and Family Services, db Consulting, LLC, Developmental Disability Center of Nebraska, LLC, Developmental Educational & Behavioral Outcomes, LLC, Easter Seals Nebraska, Easter Seals Society of Nebraska Inc., Eastern Nebraska Human Services Agency DBA ENCOR, Employment Works, Inc., Envisions of Norfolk Inc., Envisions Inc., Extended Families of Nebraska LLC, Goodwill Industries of Greater Nebraska, Habilitative Opportunities LLC, Hands of Heartland Inc., Heartland Habilitative Services LLC, Independent Horizons LLC, Integrated Life Choices, Liberty Centre Service Inc., Love Community LLC, Madonna School, MAGIS Residential Services LLC, Mental Health Association of Nebraska, Mosaic, Mid-NE Individual Services, North Star Services, North Platte Opportunity Center, Ollie Webb Center, Inc., Omni Behavioral Health, PAKS Developmental Services Inc., Prime Home Developmental Disabilities Services Inc., Region I Office of Human Development, Region V Services, South Central Developmental Services, Southwest Area Training Services, The Autism Center of Nebraska, The Community Supports Network Inc., Versatile Support Services Inc., Vital Services, and Vocational Development Center Inc.,

Written agreements are also maintained to outline roles and responsibilities for Project SEARCH. Project SEARCH partners in Nebraska include:

Businesses: Cornhusker Marriott, Madonna Rehabilitation Hospital, Walmart Distribution Center, Embassy Suites La Vista, Embassy Suites Lincoln, Faith Regional Health Services, St. Francis CHI Health, Heritage at Sterling Ridge, Mercy Medical Center, Mary Lanning Health Care, Children's Hospital and Medical Center, Columbus Community Hospital, Nebraska Medicine/Bellevue, York General Hospital, Nebraska Medicine, and CHI Health Good Samaritan Medical Center.

Schools: Bellevue Public School, Columbus Public Schools, Crete Public Schools, Elkhorn Public Schools, Grand Island Public Schools, Hastings Public Schools, Kearney Public Schools, Lincoln Public Schools, Madonna School, Malcolm Public Schools, Millard Public Schools, Norfolk Public Schools, Norris Public Schools, North Platte Public Schools, Omaha Public Schools, Papillion LaVista School District, South Sioux City Public Schools, Syracuse Public Schools, Wahoo Public Schools, Waverly Public Schools, Westside Community Schools, York Public Schools and Educational Service Units 1, 6, 7 & 9.

In addition to Project SEARCH, Nebraska VR has developed Certificate Programs which offer hands-on training programs for students and adults with disabilities. This opportunity results from a partnership with local Nebraska VR Service Offices, 3-5 core business partners, a community college, and local schools. Students take classes, tour businesses, and either work part-time or participate in an internship with the business partners.

Written agreements are also maintained to outline roles and responsibilities for Certificate Programs. Certificate Program partners in Nebraska include:

Access, Electronic Systems, A&E Electric, Heartland, Middleton, IES, Central Community College, Donner Steel Works, Methodist College, Hillcrest Assisted Living, Good Samaritan Society of Millard, and Brookstone Village

To maximize limited resources and assist individuals to access other programs which can provide needed services essential to individuals achieving employment, Nebraska VR works cooperatively with and utilizes numerous services and facilities within the state. These services and facilities include Centers for Independent Living, the Parent Training and Information Center, Apprenticeship Programs, schools, Educational Service Units and businesses.

2. *State programs carried out under section 4 of the Assistive Technology Act of 1998;*

The Nebraska Assistive Technology Partnership (ATP), part of Nebraska VR and the Nebraska Department of Education (NDE), receives a grant from NDE/Special Education to provide services to professionals (e.g. IEP/IFSP Team) working with children, ages birth to 21, with disabilities. These services include technical assistance and training on assistive technology (AT). Examples of technical assistance and trainings provided are: how to consider AT in the IEP/IFSP, how to conduct an AT assessment, how to acquire and provide AT tools/systems, implementing AT effectively, and evaluating the effectiveness of the AT for the student/child. ATP also promotes the use of AT through various awareness activities and maintains a statewide assistive technology loan pool that professionals can access in order to fill a temporary need for a student/child or assist in the AT decision-making process. The vision of the ATP-Education program is to ensure that individual children/students can be successful by creating systemic capacity that results in quality Assistive Technology services for every child/student who needs AT.

The agency contracts with the Nebraska ATP to provide rehabilitation engineering and assistive technology services to agency clients at all stages of the rehabilitation process. Clients are referred to ATP by Nebraska VR staff for all assistive technology assessments, funding coordination and assistive technology solutions. ATP offices are located throughout the state and in some cities are co-located with the VR office. VR will continue to participate in the VR/ATP monthly meetings and serve as a member of the ATP Advisory Council.

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

Nebraska VR works cooperatively with and utilizes Rural Economic Area Partnerships, and other programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture, when these programs and resources are available to local communities for economic development, and to the extent such cooperation and utilization is permissible under the Rehabilitation Act, as amended.

Nebraska VR works with AgrAbility which is a National AgrAbility Project (NAP) and a State/Regional AgrAbility Project (SRAP). All AgrAbility Projects report to the USDA Cooperative State Research, Education, and Extension Service in Washington, D.C. The National AgrAbility Project and its state programs are supported by the United States Department of Agriculture (USDA) through a competitive grant process. Nebraska AgrAbility is a joint effort of the University of Nebraska Extension and

Since 1995 Nebraska AgrAbility has helped individuals with disabilities overcome barriers to continue in their chosen agricultural profession. The vision of AgrAbility is to enhance quality of life for farmers, ranchers, and other agricultural workers with disabilities, so that they, their families, and their communities continue to succeed in rural America.

Nebraska VR and AgrAbility staff are to work collaboratively in serving farmers/ranchers with a disability. Nebraska VR services are available to clients working with the AgrAbility project that are necessary to prepare for, secure, retain, advance or regain an employment outcome, e.g., assessment to determine vocational rehabilitation needs, counseling and guidance, information and referral, physical and mental restoration services, vocational training, maintenance, transportation, post-employment services, occupational licenses, tools, equipment, initial stocks and supplies, rehabilitation technology and technical assistance.

Most AgrAbility clients are expressing a need for rehabilitation technology to maintain their current employment. Nebraska VR determines the employment status (self-employed, partner, contract worker or labor-employee) and the specific vocational needs of the individual to determine the next steps. For self-employed, partners, and contract workers, Nebraska VR determines ownership and financial viability of the business prior to investing state and federal funds. If the business is viable, AgrAbility conducts an assessment of the work environment to provide recommendations for accommodations to Nebraska VR and the client. If a business is determined not to be viable, all Nebraska VR services are available to assist the client in finding alternate employment or referral to other resources for assistance. An individual who is an employee of an agricultural business is subject to employment laws surrounding reasonable accommodation by the employer in the work place. Nebraska VR does not conduct a financial viability study of the business in these cases, but includes the employer/owner of the business in the AgrAbility assessment and plans to accommodate the client. The Nebraska VR Program Director of Counseling and AgrAbility staff meet regularly to discuss service expectations to ensure consistency across the state.

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

Nebraska VR works closely with local Workforce Boards in coordinating services and supports for out-of-school youth. An agreement providing data exchange and sharing of information has been established between Nebraska VR and the local Workforce Boards. Nebraska VR staff also participate in the Foster Up Connections Team, a committee that works on issues related to systems involved with youth and statewide facility-based youth.

5. State use contracting programs.

The State of Nebraska does not have a state use contracting program.

d. Coordination with Education Officials

Describe:

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

The Office of Special Education, under the Nebraska Department of Education, is responsible for the provision of a free and appropriate public education. Nebraska VR is the adult services agency responsible for providing vocational rehabilitation services. There is a current Inter-Departmental Agreement to facilitate the transition of students receiving special education services.

Nebraska has a strong tradition of local control with over 250 local school districts offering secondary education. Many districts are small, enrolling fewer than 100 secondary students, and having less than 10 students with disabilities. Nebraska has VR Specialists assigned to each of the Nebraska high schools partnering and collaborating with school staff in providing transition services including Pre-Employment Transition Services. Nebraska VR's policies and procedures are consistent with the Act's timely expectation for the development and approval of projected post school employment outcomes for all students who are eligible for Nebraska VR employment services.

Nebraska VR and Nebraska Commission for the Blind and Visually Impaired (NCBVI) have jointly agreed on the minimum age of 14 for students with disabilities to begin the provision of Pre-Employment Transition Services per the NCBVI and Nebraska VR Cooperative Agreement. Staff may use a projected post school employment outcome to develop the IPE with students eligible for pre-employment transition after eligibility for VR services is established.

The IPE should be developed/approved within 90 days of determining eligibility for students. The IPE with projected post-school employment outcome should:

- Outline the services and activities that will guide the individual's career exploration;
- Include the Pre-Employment Transition Services necessary for the student to explore career options;
- Align with the Individualized Education Program (IEP) or 504 services, as applicable;
- Facilitate the individual's exploration and identification of an employment goal based upon informed choice;
- Be a specific projected post school employment outcome;
- Be amended during the career development process and revised to a specific employment goal once this process is completed. Staff must amend the IPE as soon as they have agreed on an employment goal prior to graduation or exit from the secondary school setting.

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;

The Inter-Departmental Agreement with the Nebraska Department of Education outlines the consultation and technical assistance needed to assist local educational agencies and Educational Service Units in planning for Pre-Employment Transition Services and the transition of students with disabilities from school to post-school activities, including employment, post-secondary education, vocational rehabilitation services or services from an appropriate adult service agency.

The current Inter-Departmental Agreement to facilitate the transition of students receiving special education services was signed by the Director of Nebraska VR, Assistant Director of Special Education, and the Commissioner of Education, effective January 1, 2019 through December 31, 2020.

Nebraska VR will provide consultation and technical assistance to Local Educational Agencies (LEAs) regarding services to potentially eligible and eligible students with disabilities (SWD). These services are intended to benefit SWD as they transition from school to post-secondary life related to an employment outcome. Consultation and technical assistance will encompass sharing specialized knowledge of disabilities and the implications for employment, labor market information and information about in-demand industry sectors, career pathways, rehabilitative services such as assistive technology, types of educational and occupational training needed to succeed in the workplace, post-secondary opportunities, understanding employer expectations, youth leadership opportunities, and linkages to other service agencies. Such consultation will be shared individually with LEAs as needed and requested by VR Pre-Employment Transition Coordinators and as members of state and regional advisory and capacity building teams. A Transition Services Planner booklet serves as a guide to educators in arranging Pre-Employment Transition Services and VR services for SWD and a Transition Partnership Planning Agreement is completed on an annual basis with every high school in the state to define roles and responsibilities as well as guide the coordination of effective transition service delivery. Consultation and technical assistance is provided face-to-face, via telephone conference calls or alternative video conferencing platforms.

The Program Director for Transition participates as a member of the Nebraska Special Education Advisory Council (SEAC), the Transition Practitioners Advisory Council, and other statewide bodies related to transition service planning and delivery.

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

Transition partnership planning occurs with schools, Educational Service Units, and Nebraska VR at the local level. This planning promotes a coordinated effort between the local school, ESU, and the local Nebraska VR Office. The planning process identifies the nature and scope of services the local Nebraska VR Office will provide in coordination with the efforts of the school and/or ESU. The process addresses the schedule of events and activities, expected outcomes, and a process to evaluate the effectiveness of the partnership. Nebraska VR develops local interagency agreements with school districts and Educational Service Units to address the coordination of the provision of Pre-Employment Transition Services to students with disabilities and the joint responsibilities of each agency in providing and paying for Pre-Employment Transition Services and transition services. Yearly surveys are completed with school and ESU personnel to support continuous improvement.

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

The Inter-Departmental Agreement between Nebraska VR and the Nebraska Department of Education/Office of Special Education specifies roles and responsibilities, including financial obligations for both Nebraska VR and the Nebraska Department of Education/Office of Special Education in the provision of transition services including Pre-Employment Transition Services. Nebraska VR continues to work closely with the Office of Special Education, i.e., providing cross training to schools, Educational Service Units, and Nebraska VR staff about the provisions to WIOA pertinent to transition services, and jointly developed a Transition Planning Guide for use by school staff, agency staff, parents, and students to help guide the transition process.

The roles, responsibilities, and financial responsibilities for Nebraska VR specified in the Inter-Departmental Agreement include:

- Provide Pre-Employment Transition Services in collaboration and coordination with the LEA ensuring that services, including individuals served under an IPE, are not duplicative nor do they supplant existing LEA services
- Provide consultation and technical assistance to educators
- Participate in the development of the employment related components of the IEP based on individual need
- Develop an IPE for students within 90 days of eligibility unless an extension is approved
- Ensure the IEP goals are consistent with the IPE employment goals
- Provide or arrange for services required by the IPE goal
- Provide assistance in the purchase of tools, supplies or other job related personal expenses for eligible students who have demonstrated success as it relates to the IPE goal
- Arrange and pay for job development needed to serve students with the most significant disabilities who require supported employment services and assist in the coordination of long term supports
- Assure the completion of certain service related activities and that these activities are documented before a 14 (c) may begin compensating a youth with a disability at sub-minimum wage
- Use information provided by education to provide appropriate Pre-Employment Transition Services and to determine eligibility for VR services, securing additional information only when necessary and assuming the financial cost of obtaining additional information

NDE Office of Special Education will ensure LEAs understand their responsibilities to:

- Provide all existing educational assessment and performance information relevant to the determination of VR eligibility and to assist in the delivery of Pre-Employment Transition Services
- Consult with Nebraska VR for identification of students' vocational needs and services
- Develop and complete the transition component of the IEP based on individual need
- Ensure IEP transition/employment goals are consistent with IPE goals where appropriate
- Work with Nebraska VR staff to identify appropriate referrals and supports needed to complete a VR application where appropriate
- Pay for all services listed on the IEP unless another agency or entity agrees to provide such services
- Provide and/or pay for job coaching when needed as part of the instructional component of the IEP
- Provide and/or pay for extended school year supports as needed
- Advise the LEA not to enter into an agreement with an entity holding a special wage certificate under 14 (c) of the Fair Labor Standards Act for the purpose of operating a program where the SWD is engaged in work at a subminimum wage
- Refer any student with a disability known to be seeking subminimum wage to Nebraska VR and provide documentation about the provision of Pre-Employment Transition Services
- Request consultation and technical assistance from Nebraska VR for planning and implementation of transition services

Nebraska VR and NDE work collaboratively to determine who is the lead agency and qualified personnel. At a state level, Nebraska VR and NDE meet regularly to discuss the delivery of Pre-Employment Transition Services. Nebraska VR takes the lead in ensuring the delivery of Pre-Employment Transition Services and partners with NDE on specific measures to support such delivery, e.g. joint guidance documents for school districts, summer transition program funding, and transition services monitoring efforts.

On the annual Partnership Planning agreement that is completed with every school district, the question of who will provide each of the five (5) Pre-Employment Transition Services is addressed as well as how VR, the school, and the Educational Service Unit will collaborate around the delivery of Pre-Employment Transition and Transition Services. VR Pre-Employment Transition Coordinators provide direct services to students and are trained in the delivery of Pre-Employment Transition and Transition Services and provided resources through the Nebraska VR Job Planning Resource Guide. Pre-Employment Transition Coordinators work collaboratively with school and Educational Service Unit staff to identify the services required by students and to plan the most effective service delivery method including which agency will take the lead on such delivery. In a multi-tiered system of support (MTSS), Nebraska VR involvement is directly related to the level of support needed by the student and the point at which VR involvement is required.

The Inter-Departmental Agreement between Nebraska VR and NDE contains a clause to accommodate amendments at any time based on mutual consent of the parties and requiring the amendment to be written, signed, and dated. At this time, no changes are anticipated in the Agreement prior to its end date of 12/31/2020.

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

Outreach and identification efforts are directed to special education staff, school administration, career and technical education, school counseling, school nursing, and school personnel having knowledge of students with disabilities, including those not receiving special education services. In addition, outreach efforts are made to students with disabilities and their parents.

Following are examples of transition services outreach and collaboration:

- Nebraska VR serves on the Nebraska Department of Education's Special Education Advisory Council. This committee meets throughout the year to share information, identify issues, and coordinate secondary education and transition services for students with disabilities.
- Nebraska VR and the Nebraska Department of Education/Office of Special Education co-funds a Youth Leadership Facilitator and a Nebraska Youth Leadership Council.
- Serving on the statewide Nebraska Youth Leadership Council provides an opportunity for youth with disabilities to develop leadership skills and promote self-advocacy. The Council works with youth and organizations across the state to promote the Council's goals and activities and the maintenance of regional councils. There are five (5) regional councils across the state and each council meets four (4) times throughout the year and all councils come together for a statewide meeting in the summer. Council members reach out to students and youth with disabilities as well as to community members to highlight and promote awareness of disability rights issues.
- Nebraska VR provides financial support and consultation for five (5) regional Transition Youth Conferences for students, aged 16-21, hosted at local community college sites. The conferences focus on employment, post-secondary educational opportunities, self-advocacy, utilizing community supports, and assistive technology. The students are exposed to a variety of interactive and informative discussions and activities to prepare for learning, working, and navigating as a young adult in the real world.
- In an interagency collaborative effort, Nebraska VR partnered with the Nebraska Department of Education/Office of Special Education, ESUs, Disability Service Offices at Institutes for Higher Education, and PTI Nebraska to participate in a Capacity Building Institute hosted by the National Secondary Transition Technical Assistance Center. Work continues at a local level to develop resources, which will help professionals, parents, and students answer critical questions about the coordination of services and access to resources surrounding the five (5) required Pre-Employment Transition Services activities.
- Nebraska VR is providing financial support to the Nebraska Department of Education/Office of Career and Technical Education to provide training to guidance counselors and special education staff regarding the Career Pathway Advancement Project (CPAP) grant. The Office of Career and Technical Education office will educate high school staff regarding the training and employment opportunities for students when referred to Nebraska VR Career Pathway Recruiters. Local school staff will also be made aware of the grant by Nebraska VR staff that work with transition students within the high schools. This will encourage referrals to Nebraska VR for students interested in career pathway advancement.
- The Nebraska Assistive Technology Partnership (ATP), part of Nebraska VR and the Nebraska Department of Education (NDE), receives a grant from NDE/Office of Special Education to provide services to professionals (e.g. IEP/IFSP Team) working with children, ages birth to 21, with disabilities. These services include technical assistance and training on assistive technology (AT). Examples of technical assistance and trainings provided are: how to consider AT in the IEP/IFSP, how to conduct an AT assessment, how to acquire

and provide AT tools/systems, implementing AT effectively, and evaluating the effectiveness of the AT for the student/child. ATP also promotes the use of AT through various awareness activities and maintains a statewide assistive technology loan pool that professionals can access in order to fill a temporary need for a student/child or assist in the AT decision-making process. The vision of the ATP-Education program is to ensure that individual children/students can be successful by creating systemic capacity that results in quality Assistive Technology services for every child/student who needs AT.

- Nebraska VR supports fifteen (15) Project SEARCH sites across the state. Consistent with the national model, Project SEARCH is a partnership between Nebraska VR, a business, area school systems, the Nebraska Commission for the Blind and Visually Impaired, Assistive Technology Partnership, and Division of Developmental Disabilities. The one (1) year school-to-work program is business-led and takes place entirely in the workplace. The experience includes a combination of classroom instruction, career exploration, and hands-on training through worksite rotations. While completing the rotations, the students have the opportunity to gain transferable skills, practice self-advocacy, and demonstrate work readiness. Nebraska's Project SEARCH programs are hosted in a variety of businesses including hotels, hospitals, and distribution.
- Nebraska VR funds Family Employment Awareness Training (FEAT) provided by PTI Nebraska. The goals of FEAT are to increase expectations for competitive, integrated employment for students with disabilities and to increase knowledge of state and federal resources to support the employment of young people with disabilities.
- Nebraska VR has supported summer transition programs across the state in conjunction with the Nebraska Department of Education through partnerships with agencies, businesses, schools and educational service units. The summer transition programs were provided pursuant to a yearly formal Request for Proposal process.

Nebraska VR and Nebraska Commission for the Blind and Visually Impaired (NCBVI) have jointly agreed on the minimum age of 14 for students with disabilities to begin the provision of Pre-Employment Transition Services per the NCBVI and Nebraska VR Cooperative Agreement.

Having a VR Pre-Employment Transition Services Coordinator in every high school across the state and having an annual Partnership Planning agreement ensures that SWD are identified statewide. Partnership with alternative and systems involved schools is also in place.

Referral Process

Who should refer students? Special Education educators, guidance counselors, school nurses, school psychologists, speech language pathologists, administrators, regular educators, and parents/guardians may refer students to Nebraska VR. Students may also self-refer.

Who should be referred? Students verified for Special Education, students under a 504 Accommodation Plan, students with a disability for the purposes of section 504 (even if they do not have a 504 Accommodation Plan in place).

When should a referral be made? Students may be referred at age 14 to begin the process of engaging in Pre-Employment Transition Services. Typically, students are referred in the second semester of their sophomore year or at the beginning of their junior year. In certain circumstances, it may be in the student's best interest to be referred at an earlier age.

What is the referral process? Any referral source may complete a Nebraska VR Referral form and submit to the Nebraska VR Pre-Employment Transition Services Coordinator. The Nebraska VR Pre-Employment Transition Services Coordinator will contact the student and parent or authorized representative within 10 days of the referral. An appointment will be scheduled at the earliest possible time to provide Pre-Employment Transition Services Orientation and to complete a Pre-Employment Transition Services Consent and Release form or an application for VR services. A parent or guardian consent is required for students under the age of 19 and all students with an IEP.

A Pre-Employment Transition Services Coordinator is assigned to every high school in Nebraska and a Partnership Planning agreement is signed with every school district every year, outlining the process for VR referral and discussing the options for obtaining parent/authorized representative signatures. In some cases, where practical, an educator may obtain parental/authorized representative signature on the Pre-Employment Transition Services Consent & Release form.

A parent or authorized representative signature on the Pre-Employment Transition Consent and Release form is sufficient to verify the student's disability for the purposes of Pre-Employment Transition Services. Further information can be gathered to assist with planning including the MDT report, IEP, medical information, etc.

Nebraska VR determines the number of potentially eligible students with disabilities in the state through:

- partnership planning meetings and agreements,
- accessing data from the Nebraska Department of Education,
- meeting annually with schools (to complete the transition agreement) and this is an opportunity to identify students on IEPs, 504 plans and those who might be potentially eligible for our services and exchange of information from Developmental Disability Services regarding potentially eligible students.

e. Cooperative Agreements with Private Nonprofit Organizations

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Nebraska VR has written procedures for establishing written agreements with 410 service providers, including private nonprofit vocational rehabilitation service providers. These procedures emphasize the role of local VR offices in identifying needs for specific vocational rehabilitation services responsive to the needs of persons with significant disabilities in their areas. They also emphasize the role of local VR and community rehabilitation staff in monitoring the agreements, including usage and effectiveness of services.

Background screening is required for all individual providers with written agreements who provide job coaching, independent living skills exploration and training, supported and customized employment, and self-employment consultation. Providers who employ individuals who deliver services requiring background screening must furnish written assurances those employees have not been convicted of a felony or misdemeanor involving neglect and/or abuse of a child or vulnerable adult before the written agreement is approved.

Currently, Nebraska VR does not have any formal Cooperative Agreements that utilize state and local dollars for matching federal funds.

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

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

On the state level, Nebraska VR has agreements with the Nebraska Department of Health and Human Services Divisions of Developmental Disabilities (DDD) and Behavioral Health (DBH). The agreements outline coordination of efforts for the delivery of supported employment services to those mutually served by the agencies.

The interagency agreement with DDD includes referral by DDD of those individuals who desire competitive, integrated employment. Nebraska VR determines eligibility and the need for VR services including supported employment, and develops the Individualized Plan for Employment (IPE), authorizing supported employment under a milestones payment schedule. The agencies, under written agreement, share information on the status of applications for developmental disabilities services of students exiting education programs (to coordinate efforts for services upon exit from the education system), and communicate on matters related to supported employment provider implementation of the sub-minimum wage requirements under the Workforce Innovation and Opportunity Act (WIOA). VR also agrees to provide information for individual planning purposes including individuals' status with regard to being able to benefits from VR services as well as information about extended service needs upon VR closure.

Under an Interagency Agreement with DBH, Nebraska VR determines eligibility for VR services and refers individuals to supported employment providers that have agreements with both VR and DBH. Together, the agencies fund supported employment milestones under a braided payment schedule. Supported employment services begin after job placement and are to maintain and support an individual with the most significant disabilities in employment. Job placement services are VR services.

At the local level**,** Nebraska VR enters into written service agreements with providers of supported employment services. These providers are either agency providers — public or private non-profit community rehabilitation

programs and private for-profit entities or individual providers certified by Medicaid to provide DDD services. Nebraska VR has a written policy and procedures for entering into these agreements.

g. Coordination with Employers

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR Services; and

In Nebraska, coordination with employers is essential to creating competitive integrated employment and exploration opportunities. In an effort to increase the partnerships Nebraska VR has with employers, the following activities have been implemented:

Nebraska VR's Dual Customer Approach

Nebraska VR has engaged in a dual customer approach to the provision of employment-related services for many years as embodied in its mission statement, "We help people with disabilities prepare for, obtain, and maintain employment while helping businesses recruit, train, and retain employees with disabilities." This has led to a job-driven approach in Nebraska VR's development of customized training programs such as Project SEARCH, Certificate Programs, Work-Based Learning Experiences, and On the Job Evaluation and Training sites. Nebraska VR extended the job-driven emphasis with the implementation of a "Meet You Where You Are" model that includes a rapid engagement (Progressive Employment) focus engaging individuals in an element of work as quickly as possible. Nebraska VR staff are actively involved in the recruitment and support of businesses to partner with VR on rapid engagement activities.

Business Account Managers and Placement Specialists

Nebraska VR has created four (4) positions designated as Business Account Managers (BAMs) whose role is fostering relationships with current and prospective business partners. As the BAMs meet with employers, the focus is not only on current hiring needs and exploration of opportunities that may eventually lead a client to employment, but also on providing education and resources to businesses regarding accommodations, creating an inclusive workplace, disability etiquette, and other related topics. The first part of these coordinated exploration opportunities includes but are not limited to: On the Job Evaluation (OJE), Work-Based Learning Experiences (WBLE), mock interviews, and company tours. The second piece of this partnership includes training, outreach, and resource sharing. Over time, Nebraska VR will consider increasing the number of BAMs available in the state.

Nebraska VR Placement Specialists are available across the state to assist individuals with disabilities find and keep jobs. The Placement Specialists work with clients and businesses to ensure appropriate supports are available for job seeking and job retention.

Placement Specialists and BAMs enter business information into an electronic Employer Database application. This application is accessible to all Nebraska VR staff. It not only provides the agency with "business memory," it also allows Nebraska VR to track employer contacts and the variety of career exploration activities each business is willing to complete.

Nebraska VR's Talent Bank is another resource available to staff. The Talent Bank can graphically display aggregate information from the case management system by client job goal. This allows teams to strategically target employers by sectors in response to the number of job goals presented.

As the BAMs and Placement Specialists are meeting with employers, anecdotal labor market information is gathered. Employers are sharing current hiring needs with VR staff. The use of anecdotal and real time labor market information is an important component of Nebraska VR's work to support businesses.

Career Pathway Advancement Project

Nebraska VR is a recipient of a Career Pathway grant. The Career Pathway Advancement Project represents the next evolution of vocational rehabilitation by proactively improving the likelihood of economic self-sufficiency for individuals with disabilities, including youth with disabilities. The project builds off of existing Department of Labor career pathways initiatives in Information Technology, Manufacturing and Transportation, Distribution and Logistics, Healthcare, and Architecture and Construction. It has expanded partnerships with other agencies including Easter Seals Nebraska, Assistive Technology Partnership, Nebraska Department of Education (NDE) Career Education, and the Institute for Community Inclusion. Ultimately the project allows VR eligible individuals over the course of the project

to access career pathway partnerships with businesses and educational institutions. A proven upskill/backfill business model is used to create opportunities for former VR eligible individuals to advance their careers and open up new opportunities for other VR eligible individuals.

ADA and Section 503 Training

There are a variety of opportunities available for Nebraska VR to present ADA and Section 503 information to businesses. Nebraska VR maintains membership with fourteen (14) Chambers of Commerce across the state. VR staff have presented at ADA conferences and hosted National Disability Employment Awareness Month forums.

NET and TAP

Nebraska's Program Director for Business Services is a National Employment Team (NET) contact. Nebraska's NET contact receives timely information about national job openings and partnerships and participates in conference call business meetings. Nebraska VR staff receive information/training specific to the Talent Acquisition Portal (TAP) and its benefits are shared with businesses.

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

Nebraska VR and Nebraska Commission for the Blind and Visually Impaired (NCBVI) have jointly agreed on the minimum age of 14 for students with disabilities to begin the provision of Pre-Employment Transition Services per the NCBVI and Nebraska VR Cooperative Agreement.

Work-Based Learning Experiences

Many of the activities highlighted under (1) VR Services also enhance Nebraska VR's transition services including Pre-Employment Transition Services. For example, as the Business Account Managers are working with employers, opportunities for students and youth are also explored. These work-based learning opportunities may include informational interviews, work-based learning experiences, job shadows, company tours, On-the-Job Evaluation and Training, internships, and placement assistance.

Certificate Programs

For the past several years, Nebraska VR has developed and maintained Certificate Programs. These Certificate Programs provide hands-on training for students and youth with disabilities (adult VR clients may also enroll). The specialized training results from a partnership with local Nebraska VR service offices, three (3) to five (5) core business partners in the area, a community college, and local schools. Students take classes, tour businesses and either work part-time or participate in an internship with employer partners. The programs are business-driven, short term, real life trainings that teach both technical hard skills and soft skills. Each training opportunity gives the students an opportunity to acquire the skills that they need to pursue in-demand jobs and careers. Current Certificate Programs offered include: Electrician Helper, CNA, and Welding. Nebraska VR will explore increasing the number of Certificate Programs available in the state.

Project SEARCH and Business Advisory Councils

There are currently fifteen (15) Project SEARCH sites in Nebraska. Consistent with the national model, Project SEARCH is a partnership between Nebraska VR, a business, area school systems, the Nebraska Commission for the Blind and Visually Impaired, Assistive Technology Partnership, and Division of Developmental Disabilities. The one (1) year school-to-work program is business-led and takes place entirely in the workplace. The experience includes a combination of classroom instruction, career exploration, and hands-on training through worksite rotations. While completing the rotations, the students have the opportunity to gain transferable skills, practice self-advocacy, and demonstrate work readiness. Nebraska's Project SEARCH programs are hosted in a variety of businesses including hotels, hospitals, and distribution.

There are currently four (4) Project SEARCH Business Advisory Councils (BAC) in Nebraska, with the potential expansion of four (4) more. The goal of the BAC is to broaden the program across a variety of industries, provide individuals with disabilities access to the resources they need to be successfully employed in a wide-range of fields and serve as a platform to further educate business professionals about the benefits of employing individuals with disabilities. The measurable goal is 100% employment of Project SEARCH intern participants. Between the four (4) Nebraska BACs there are more than thirty (30) businesses involved. Nebraska VR will consider the expansion of BACs.

Project SEARCH also hosts an annual job fair for approximately 400 students with disabilities that provides the students with multiple opportunities to gain experience and knowledge of workplace activities and skills. These activities include mock interviews, skills assessments, classroom instruction, and interaction with employers. This event also brings in over fifty (50) employers from the area that have the opportunity to engage with potential applicants.

Sector Partnerships

Recently, Nebraska worked to develop several sector partnerships throughout the state. These partnerships are business-led with a focus on a specific prominent industry in that area (healthcare, manufacturing, etc.). A champion in that industry is assigned to lead the meetings and the goal of the sector is determined by each area (recruitment, retention, partnering with schools, etc.).

h. Interagency Cooperation

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

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

Nebraska VR and the Division of Developmental Disabilities (DDD) of the Nebraska Department of Health and Human Services (DHHS), which administers Medicaid state waivers for people with intellectual and developmental disabilities, collaborate in the following ways according to a Memorandum of Understanding:

Reciprocal referrals between agencies: DDD refers to Nebraska VR eligible persons of any age who desire to seek competitive, integrated employment. DDD provides a copy of the individual's current Individual Support Plan (ISP) for use in developing and complementing the VR IPE and DDD service coordinators are invited to meetings in which Individualized Plans for Employment (IPE) are developed.

Nebraska VR counselors are trained to identify and support people to apply for developmental disabilities services so that extended services can be accessed under Nebraska's waivers.

An administrative process completed by the two agencies supports the identification of students graduating from Nebraska's schools so that efforts can be made to identify potential extended services funding after Nebraska VR services are complete.

Liaison staff: Liaison staff from Nebraska VR and the DDD meet regularly to address concerns, develop and improve joint processes, identify training needs of staff in both agencies, and conduct such training.

Directors and program administrative staff from both agencies meet regularly to assess processes and resolve issues that arise.

Confidentiality of Information: The Memorandum of Understanding between DDD and Nebraska VR outlines agreements to ensure records are maintained in a confidential manner and communication between agencies is completed via encrypted email.

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

Nebraska VR accepts referrals of people with developmental disabilities who have a desire to seek competitive, integrated employment and coordination of services with the Nebraska Health and Human Services, Division of Developmental Disabilities (DDD) agency to support employment goals. Nebraska VR works with DDD-contracted providers, developing service agreements for the provision of supported employment services. Nebraska VR develops supported employment plans in cooperation with the State DDD Service Coordinator and supported employment provider, authorizes supported employment under a milestone payment schedule, and supports transition to extended services funded by DDD upon successful closure of the VR case.

Under Nebraska VR's written agreement, Nebraska VR and DDD share information on the status of referrals and applications for both agencies and eligibility status or students exiting education programs. Communication occurs regarding supported employment provider implementation of sub-minimum wage requirements consistent with and in compliance with the Workforce Innovation and Opportunity Act. In addition, Nebraska VR provides written

documentation about individuals' inability to benefit from VR services or about specific long-term support needs so that individuals can be appropriate and effectively served.

Nebraska VR has a representative on the Nebraska Council of Developmental Disabilities and a liaison with DDD. Periodically, training is provided to staff of both agencies by the liaisons.

3. The State agency responsible for providing mental health services.

Nebraska VR and Nebraska Health and Human Services, Division of Behavioral Health (DBH) provide braided funding for an outcome-based milestone system of supported employment for eligible individuals with diagnoses of serious mental illness and/or substance use disorders. The two (2) agencies share information on funding levels, persons served, and related data to monitor and evaluate the implementation of supported employment programs for this population. VR has service agreements with supported employment providers that contract with six (6) Behavioral Health Regions funded by DBH. Nebraska VR pays for three (3) of the four (4) supported employment milestones; DBH pays for one (1) of the four (4) milestones as well as extended supports after VR closure.

Regular communication is key to ensuring on-going success of this model. DBH and VR staff at the administrative level meet regularly to discuss implementation issues that arise including, most recently, VR's Order of Selection (OOS). While under OOS, VR was unable to fund milestones in accordance with the interagency agreement; DBH was able to prioritize the supported employment program for funding so that all milestones could be paid by DBH. When VR began serving people from its wait list, the agency coordinated efforts with DBH to return to braided funding of milestones.

All local VR teams have at least one (1) designated liaison who meets regularly with each area supported employment provider. In addition, the VR Program Director and/or VR Office Directors meet quarterly with supported employment providers to discuss data reports identifying progress to consider what is working and process improvements to achieve greater success of the supported employment program.

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. System on Personnel and Personnel Development

A. Qualified Personnel Needs

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

Nebraska VR (VR) maintains a system for collecting and analyzing data on qualified personnel needs which includes: the number of personnel currently employed by VR by personnel category, the number of positions currently available to VR by personnel category, and projections of the number of personnel who will be needed in five (5) years by personnel category. The table summarizes this information for direct service personnel as of December 20, 2019:

Table 39. Direct Service Personnel Employees

-	Rehab Specialists	Service Specialists	Associates
Direct Service Personnel Employed	49.35	45.90	26
Personnel to Client Ratio after IPE	1:27	1:29	1:50
Personnel to Clients Ratio All Clients	1:169	1:182	1:321
Projected Staffing Requirements *(All vacancies filled)*	60.15	59.65	36
Current Vacancies	10.8	13.75	10
Projected Replacement Needs (5 year total)	13	2	9

Table 40. Non-Direct Service Personnel Employees

-	Senior Administrator	Program Directors Office Directors	Information Technology	Program Specialists Administrative Specialists Administrative Associates	Office Associates
Non-Direct Service Personnel Employed	2	15.8	5	7.6	1
Projected Staffing Requirements	2	17.8	7	11.6	2.13
Current Vacancies	0	2	2	4	1.13
Project Replacements (5 year total)	1	4	1	1	10

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

See the two tables above.

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.

See the two tables above.

B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

There are no institutions of higher education in Nebraska receiving funds from WIOA to prepare vocational rehabilitation professionals.

With changes in the Comprehensive System of Personnel Development requirements and hiring Bachelor's with paid and unpaid disability-related experience and Master's in other disability-related disciplines, requesting enrollment statistics from Nebraska post-secondary institutions' current Bachelor and Master's candidates in a number of disability and business/employment related disciplines is neither feasible nor helpful. Consequently, there is no personnel development data system on potential graduates.

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

N/A

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.

N/A

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

There is a projected need to replace an average of 15-20 VR service delivery staff annually due to resignations and retirements over the next five (5) years. The dual customer focus of serving both individuals with a disability and employers along with a heightened emphasis on providing Pre-Employment Transition Services to students with a disability and serving youth with a disability may have an impact on how staff are recruited.

Recruitment

The ability of Nebraska VR to recruit qualified specialists continues to be impaired by the absence of:

1. a federal traineeship support for a long-term rehabilitation training program in Nebraska,
2. the inadequate regional supply of qualified applicants with an obligation to the public vocational rehabilitation program, and
3. recruiting personnel having a 21st century understanding of the evolving labor force and needs of individuals with disabilities.

As previously stated, there are no institutions of higher education in Nebraska receiving funds to prepare vocational rehabilitation professionals. However, Nebraska VR has had staff enrolled in programs located in other states.

Nebraska Department of Education and Nebraska VR policy supports continuing education for employees in two (2) primary ways: (1) allowing employees to take post-secondary coursework during work time, or (2) reimbursement for job-related post-secondary coursework taken by the employee on non-work time.

Qualified rehabilitation and service specialists are actively recruited from the Nebraska higher education institutions as well as rehabilitation education programs located primarily in the Midwest. The agency supplements the distribution of Rehabilitation and Service Specialists' vacancy postings by sending announcements directly to the following:

- University of Nebraska Lincoln
- Creighton University
- Bellevue University
- Chadron State College
- Doane College
- Wayne State College

The following are rehabilitation education programs in adjacent and other Midwest states the agency sends specialist vacancy announcements.

- Drake University
- Emporia State University
- South Dakota State University
- St. Cloud State University
- The University of Iowa
- University of Wisconsin – Stout

There is active recruitment of qualified personnel with disabilities and those from racial and ethnic minorities. Our vacancy postings are sent to the Nebraska Latino-American Commission, the Urban League of Nebraska, the Nebraska State Independent Living Council, the State Rehabilitation Council, the five Nebraska Centers for Independent Living and the Center for Independent Living in Council Bluffs, Iowa.

An increased salary differential is offered to individuals who are bilingual or fluent in Spanish or American Sign Language (ASL).

Retention

The VR Director offers an opportunity for all staff to provide personal feedback on specific policies, procedures, rumors or any concern a staff member has by anonymously posting questions to "Ask the Director" on an internal website.

Nebraska VR offers staff work schedule options which include, but are not limited to a 4 day workweek (four-10 hour workdays) and compressed workweek (four-9 hour workdays and one-4 hour workday). In some cases, the agency has approved a staff person moving to a part-time schedule. This option provides a measure of autonomy to staff in balancing work and family.

On-line exit interviews are offered to staff exiting the agency. The goal of the interview is to assess why people leave, look for trends, and to learn if there was anything the agency could have done to retain them.

3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

Nebraska VR employs staff in twelve (12) self-directed teams and one (1) administrative team throughout the state to provide services and supports.

During FY 2003, Nebraska VR implemented the new "VR Service Specialist" personnel classification. This position was created as the result of a Nebraska Department of Education position classification study based on job analyses of current job incumbents. The study found that the direct service work performed by Nebraska VR staff fell into three (3) distinct classes of personnel instead of the two (2) that existed. It was recommended that VR create a VR Service Specialist position classification located between the VR Associate and VR Rehabilitation Specialist positions comprised of job duties taken from the other two (2) classifications.

VR Associate and VR Senior Associate

VR Associates provide direct support to teams serving persons with disabilities seeking employment, provide follow-up monitoring with clients, request/collect necessary medical, demographic, financial, and employment information, maintain confidential staff files, make copies, route information, process mail, maintain mailing lists, perform receptionist duties, validate and process bills for payment, prepare authorizations, procure agreed-upon goods and services, verify their receipt, and work with providers regarding payments.

Associate academic degree standards

There are no national or state approved or state-recognized standards applicable to the associate position. The highest entry-level academic degree required for comparable work in the Nebraska Department of Education Classification System requirements is ahigh school diploma. All currently employed associates meet or exceed this standard.

VR Service Specialist and VR Senior Service Specialist

VR Service Specialists provide direct support to persons with disabilities seeking employment. Their responsibilities include conducting orientation to Social Security benefits and benefits analysis, client orientation, respond to basic questions about vocational rehabilitation, assist clients in developing resumes and completing job applications, arrange job shadowing experiences and information interviews, record basis for extension of time to determine eligibility, basis for termination of VR services for reasons other than ineligibility, and trial work experience periodic assessment plan, analyze and synthesize client medical, demographic, and employment information, analyze client strengths and barriers, assess independent living skills, conduct job site analysis, make appropriate referrals to community resources, provide individualized planning and Individualized Plan for Employment (IPE) development.

VR Service Specialist academic degree standards

There are no national or state approved or state-recognized standards applicable to the VR Service Specialist. The highest entry-level academic degree required for comparable work in the Nebraska Department of Education Classification System requirement is the baccalaureate degree in a field of study reasonably related to vocational rehabilitation. Fields of study for this position include vocational rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, economics or another field that reasonably prepares individuals to work with clients and employers. In addition to the baccalaureate degree is paid or unpaid work experience for not less than one-year directly working with individuals with disabilities. All currently employed VR Service Specialists meet this standard.

VR Rehabilitation Specialist and VR Senior Rehabilitation Specialist

VR Rehabilitation Specialists make determinations and provide specialized direct services to persons with disabilities pursuing employment goals. Their responsibilities include facilitating and supporting clients in overcoming barriers to employment, interacting with clients with disabilities and responding to their individual needs which may include approving employment outcomes, finalizing and approving Individualized Plans for Employment (IPEs) and amendments to IPEs, approving IPE annual reviews, determining eligibility, priority group, and recording basis for eligibility, priority group, IPE, and employment outcome determinations and approvals.

VR Rehabilitation Specialist academic degree standards

There are no national or state approved or state-recognized standards applicable to the VR Rehabilitation Specialists. The highest entry-level academic degree required for comparable work in the Nebraska Department of Education Classification System requirement is the Master's degree or doctoral degree. Fields of study for this position include vocational rehabilitation counseling, law, social work, psychology, disability studies, business administration or another field that reasonably provides competence in the employment sector, in a disability field, or in both business-related and rehabilitation-related fields. All currently employed VR Rehabilitation Specialists meet this standard.

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.

Establishment and implementation of education and experience requirements for hiring Nebraska VR Service Specialists and Rehabilitation Specialists with a 21st century understanding of the labor force is required in the Nebraska Department of Education Classification System.

Nebraska VR has worked diligently the past few years to ensure we continue to evolve and meet the needs of individuals with disabilities and an ever-changing labor force. Nebraska VR's most significant change has been the creation of the Business Account Manager (BAM) role. This position is designed specifically to build relationships with Nebraska businesses, learn about their evolving needs, and track labor market developments. They perform these functions by going out into the community and meeting with business owners/managers and working with them to help meet their needs whether those needs are for hiring, training or consultation. The BAMs regularly attend trainings and other educational opportunities to keep up-to-date on national business practices as well as local trends.

The BAMs share this information with Nebraska VR staff through WIN (Work in Nebraska) meetings, team meetings, and through email communications. In addition, Nebraska VR keeps an employer database that is accessible to every Nebraska VR staff member that contains all the information regarding each of the businesses VR has developed within the state. It not only contains information about the business itself, but what kind of outreach has been conducted with that business and what types of engagements they will consider. BAMs have also worked with WIOA partners to establish Employ groups throughout the state that track and report local business needs and practices, perform outreach in their community, conduct tours of businesses, and report out on the latest labor market trends.

In addition to the BAM role and the Employ meetings, Nebraska VR regularly engages businesses with VR clients in different opportunities that allow not only the person with a disability to gain experience in the field, but also provide VR with a pulse on current business practice and engagements. These opportunities can include Work Based Learning Experiences, On the Job Experiences, On the Job Training or Job Shadowing. It's through these experiences VR keeps up-to-date on the labor force as well as maintaining strong business relations in communities.

Nebraska VR must provide staff with timely training on Nebraska labor market information and trends, career pathways, the world of work and career connections in order to equip VR staff with the knowledge to counsel individuals with disabilities in their pursuit of work and career and provide effective employment services.

4. Staff Development

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

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

Overview

For staff development purposes, the organizational knowledge and skill base is made up of the three (3) major domains: Disabilities, Service Delivery Processes, and Team Services. These domains are critical knowledge and skills shared by all team members.

Nebraska VR provides and supports on-going, professional career development training which may be provided either internal or external to the agency.

Internal

- New Staff Training: Newly hired VR Rehabilitation Specialists, VR Service Specialists, and VR Associates must be provided with intensive initial post-hire training to assure they possess critical performance-related vocational rehabilitation knowledge and skills. This includes Assistive Technology Partnership training. The agency continues to explore different ways of utilizing videoconferencing, podcasts or streaming videos as a way to deliver timely training to new staff. New employee training classes include the following:
- VR Implementation Training (eligibility and planning, ATP, vocational evaluation, Section 511, SSA benefits, State Rehabilitation Council, State Independent Living Council, informed choice, CAP, fair hearings, Meet You Where You Are Model, CPAP, Pre-Employment Transition, Transition, supported employment, employment/business, confidentiality, ethics, criminal background, and documentation for fair hearings)
- QE2 Case Management System (case review discussion)
- Motivational Interviewing: A refresher course was offered regionally for all staff.
- VR University: A committee identifies training needs based on case review results or requests from team members and arranges this training for all staff. Currently this training is occurring monthly.
- Program Team Tour: This tour consists of Program Directors of counseling, community services, business, transition, evaluation & community integration, the Director of the Client Assistance Program and a staff member from the Assistive Technology Partnership. Case reviews are performed and followed up with any identified training requested from the staff or found in the case reviews.
- Policy/Procedures: Program Directors provide specialized training by video-conference to update all staff on any policy/procedure/chapter changes. Examples of specific types of team services training provided directly by our staff include: community-based assessment, career counseling, vocational evaluation, job placement, and job retention assistance. Also included are Social Security benefits, job seeking skills training, maintaining individual service records, and arranging financial assistance to procure agreed upon goods and services.
- Committees: There are internal committees for each direct service (Employment, Evaluation, Consumer Input, Counselor, Leadership, Transition, Benefits, and Orientation). These committees identify any concerns or needed training trends.
- Each Office Director assesses the current knowledge, skill, and ability of the team and its members, and identifies the personnel development activities necessary to enable the team and its members to achieve their strategic and performance goals and identifies how the personnel development activities will be arranged.

External

Staff have the opportunity to participate in webinars, workshops, seminars and concentrated training activities to improve their skills. The staff can identify their own training activities or can be identified by their Office Director.

One required goal of the annual performance review of all staff relates to training needs identified by the staff member.

B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

It is essential all of Nebraska VR's administrative staff to stay current on research trends and methodologies. The vocational rehabilitation program is ever changing because the world of work is constantly changing and the finding/creating opportunities for individuals with disabilities to find employment must never end. Staying current on research allows VR to continually build knowledge and facilitate learning.

It is specifically the responsibility of the Program Directors with Nebraska VR to provide extensive direction and professional-level technical program support in the areas of compliance, regulations, rules, policies, procedures and standards; to develop and maintain technical programs and services; apply current/new management practices,

techniques, and methodologies. The Program Directors have the responsibility to stay current with any research trends and, if appropriate, review/change policies, procedures, and training.

When possible staff will participate in national conferences. Administrative staff will attend the spring and fall CSAVR Conferences where practices and research-based ideas are shared. Nebraska also participates in regional training with Kansas, Missouri, and Iowa. This is also the same opportunity for training and sharing of practices.

Rehabilitation Services Administration (RSA) created Training and Technical Assistance Centers (TAC) and demonstration projects to assist state vocational rehabilitation agencies and partners in providing services to individuals with disabilities. Each TAC focuses its efforts on a specific set of topics designed to provide universal, targeted, and intensive technical assistance (TA) for the purpose of improving services to individuals with disabilities to maximize their employment, independence, and integration into the community and the competitive labor market.

Staff often reach out to the Workforce Innovation Technical Assistance Center (WINTAC) who provide training and technical assistance, resources and strategies to help develop skills and processes. WINTAC has collected information from literature and existing state and federal programs about evidence-based and promising practices and make this information available.

Nebraska VR has been involved with demonstration projects, e.g., Progressive Employment, Certificate Program, and Career Pathways for Individuals with Disabilities Model.

When Nebraska VR becomes aware of new initiatives, this information is brought to administrative staff, discussed in any of the standing direct services committees and determine if any policies, procedures or training should be changed as a result.

Nebraska VR has created the VR University. This committee identifies training needs based on case review results or requests from team members and arranges this training for all staff. Currently this training is occurring monthly. This is also an opportunity to invite speakers on specific topics to keep VR staff up-to-date on current trends and processes, e.g., DACA, Autism Association, Epilepsy Association, and the ADA Center.

Nebraska VR's partnerships with service providers, WIOA core partners, disability groups, and advocacy groups is another way VR has stayed current with research trends.

5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Nebraska VR, to the maximum extent possible, recruits and hires qualified personnel who are able to communicate in the native languages of applicants and recipients with limited English speaking ability. An increased salary differential is offered to individuals who are bilingual or fluent in American Sign Language (ASL). Interpreter services for persons with limited English speaking ability are obtained from agencies, vendors, ethnic organizations, and advocacy groups. Nebraska VR has staff with sign language skills and staff fluent in a foreign language.

Deaf Services Unlimited is contracted with to provide video remote interpreting (VRI) and CART services. These remote services are provided when in-person interpreting services are not available. The State of Nebraska has recently passed legislation requiring the use of only licensed sign language interpreters and licensed VRI businesses in Nebraska.

6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

Nebraska VR coordinates with the Comprehensive System of Personnel Development under the Individuals with Disabilities Education Act (IDEA) by: (1) exchanging needs assessment/survey findings in areas or topics of mutual concern, (2) exchanging schedules of training and personnel development activities, and (3) joint development of training programs of mutual concern and priority, and joint funding of trainer costs for conducting joint training, when appropriate.

Additional details regarding the coordination of personnel development are provided in Section (d) of the State Plan.

j. Statewide Assessment

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

    A. With the most significant disabilities, including their need for supported employment services;

Overview

This summary represents the cumulative findings of the 2019 Comprehensive Statewide Needs Assessment (CSNA) conducted on behalf of Nebraska VR by Gemini Research and Training (GRT).

Nebraska VR administrative staff met with GRT staff multiple times to define the scope of activities including identification of specific data sources to be used in the comprehensive statewide needs assessment (CSNA). It was agreed this report would rely heavily on actual data from clients and constituents within the state rather than on secondary data analysis of existing sources. In this way, the CSNA would more readily identify any unmet needs of clients served by Nebraska VR in order to improve services to current and future clients. It is expected data provided in this report will assist Nebraska VR in developing their state plan.

The following sources of data were selected for use in the CSNA and are described in more detail within the report:

- Population data from census
- Data from RSA case closures
- Survey of Nebraska VR clients
- Survey of employers who worked with Nebraska VR
- Survey of the needs of transition-age youth and their need for Pre-Employment Transition Services.
- Survey of current Nebraska VR staff
- Survey of other stakeholders

Nebraska Population Data

According to the U.S. Census estimates for July 1, 2017, there were 1,920,076 individuals living in Nebraska. These data are based on the 2010 Census, which demonstrated that 1,826,334 individuals were residing in Nebraska. These data show a 5.1% increase in Nebraska's population over this period of time. Based on this population, there are an estimated 24.8% of persons who were under 18 years of age, 15% of persons who were 65 years or older, with 60.2% of individuals falling between the ages of 18-65. The Census also showed 50.2% of the population are female, 88.9% were white alone, 5% were black or African American, 1.4% Alaskan or Native American, 2.5% Asian, with 2.1% reporting two or more races. Across the racial groups, some 10% also reported being of Hispanic origin.

The Census data also showed in 2017, 90.7% of Nebraskans were high school graduates, while 30% held at least a bachelor's degree with a median annual income of $54,300.

RSA-911 Data

During FFY 2017, specifically October 1, 2016—June 30, 2017, Nebraska VR served a total of 8,272 clients. These clients were an average of 44.38 years in age, (SD=14.85) ranging from 16 to 75 years. These individuals were approximately evenly distributed between males and females, who were 85.7% of white or Caucasian origin, another 14.2% reported being African American, while Asian and Native American were less than one percent. Across these categories, 4.7% reported being of Hispanic origin.

During FFY 2018, the number of clients served dropped to 4,936, and in FFY 2019, that number was 2,444. Nebraska VR has been under an order of selection which explains the decrease in the overall number of clients served. It should be noted in FFY 2017, 1,788 individuals were closed successfully from the agency. In FFY 2018 this number was 1,596, and in FFY 2019 this number was 690. Based on these data, the relative proportion of clients successfully closed out of those served was 22% in FFY 2017, 32% in FFY 2018, and 28% in FFY 2019, which suggests the agency is maintaining the quality of its service delivery. The following table provides the total applicants, total closed, those closed successfully, the total number served, and the proportion of those successful out of the population actually receiving services.

Table 41. Service delivery

Status	FFY17	FFY18	FFY19
Applications	4500	3147	2208
Total Exited	5615	5261	3029
Successful	1788	1596	690
Total Served	8272	4936	2444
Success/served	21.61509	32.33387	28.23241

Consequently, based on these rehabilitation and population data the total number served has decreased in the last several years overall. This is most likely due to the Order of Selection and reduction in available funds. Given this scenario, the agency seems to have maintained consistency in its service delivery despite the cutbacks in funding.

Nebraska VR Survey Request for Input

Client Survey

During September-November 2019, several surveys were conducted with former clients of the Nebraska VR agency. These surveys collected data from the perspective of the client directly. Data were obtained on Nebraska VR clients for Federal Fiscal Years 2017-2019. Complete data including demographics were obtained on 140 clients. These individuals were an average of 47 years old, 83% report being of Anglo-American descent, with the remaining categories comprising the rest. The majority of clients (23%) report a physical disability is their primary impairment with hard of hearing being the second-most reported primary disability (20%).

Employer Survey

As part of the CSNA, employers across the state were contacted to participate in this survey to determine the extent to which they worked with Nebraska VR in helping clients with disabilities to find work and what their feedback was regarding what more Nebraska VR could do to support employers.

Complete data were collected from 57 employers who represented a broad variety of occupations. Of the sample, 60% reported having previously worked with Nebraska VR in placing a client with a disability in employment.

Pre-Employment Transition Students Survey

The next survey was conducted on the pre-employment transition-age population in the state. In order to maintain privacy for the youth, the decision was made to survey the parent or caregiver. Responses to questions about the youth were therefore provided by the primary caregiver responding to the survey. Complete data were collected on 48 youth who were an average of 18.02 years in age (SD=2.36), ranging from 7 to 22 years of age. These were 21 females (42%), 27 males (54%), with two who preferred not to answer (4.%). These students were two African Americans (4.08%); one Asian American, Asian (2.04%); two Hispanic, Latino (including Puerto Rican) (4.08%); 42 White or Caucasian (85.71%); and two who preferred not to answer (4.08%). When asked about the primary disability, there were 16 with Autism (32.65%); one Deaf (2.04%) one Epilepsy Seizure Disorder (2.04%); one Hard of Hearing (2.04%); four Intellectual Disability (8.16%); 13 Learning Disability (26.53%); One Physical Disabilities (2.04%) and 12 Other (Specify) (24.49%).

Nebraska VR Staff Survey

The next group surveyed for the 2019 CSNA was staff of the VR agency. This included vocational rehabilitation counselors, supervisors, and others who play a pivotal role in the delivery of rehabilitation services within the state. Complete data were obtained from 61 individuals during this survey.

Stakeholder Survey

The next group to be analyzed in the 2019 CSNA was the other key stakeholders across the state of Nebraska. This includes those individuals representing organizations or groups who have a vested interest in the outcomes for Nebraska's clients with disabilities but who are not otherwise represented in other areas of this study. For this survey, complete data were obtained for 35 individuals representing the following groups: Parent of a student in Nebraska (11.40%), Teacher of students in Nebraska (2.90%), Special educator in Nebraska (11.40%), Workforce Partner (2.90%), Member of a support group (5.70%), Service Provider (25.70%), State Agency (8.60%), Advocacy Group (14.30%), and Other (specify) (17.10%). For those who chose other, they wrote in family member, member of the DD

council, student in Nebraska with disabilities, Vocational Coordinator for individuals with disabilities, and Work at a lunchroom in a school with special needs students.

Summary of Survey Results

An Executive Summary of the Comprehensive Statewide Needs Assessment can be found at http://vr.nebraska.gov/2019_Needs_Assessment_Survey_Results_ExecutiveSummary.pdf.

Themes and priorities from the CSNA include:

(1) Addressing the all-around needs of the individual in order to be successful

- Housing
- Medication and health-related needs
- Transportation
- Support groups
- Living wage
- Person-centered planning
- Rehabilitation technology services to accommodate functional limitations. Nebraska VR continues a strong ongoing partnership with the Nebraska Assistive Technology Partnership (ATP) that allows Nebraska VR to offer up-to-date and effective rehabilitation technology service to our clients throughout the VR process. The identification of solutions through a technology transfer approach has provided individuals with significant disabilities expanded opportunities for employment as reflected in our program's increase in successful employment outcomes. ATP staff are co-located in most of the VR services offices which facilitates this effective collaboration.
- Transportation for employment and independence. Nebraska's 88 rural counties lack transportation resources that limit the opportunities for employment and independence among persons with significant work disabilities. Resources for addressing this need vary by community and for the most part transportation services are viewed as likely areas for budget cuts. Private and non-profit transportation resources also struggle with maintaining service levels essential to the elderly and persons with significant disabilities even in the more populous counties and cities. An emerging trend among students and youths with disabilities is the lack of interest in obtaining a driver's license which contributes to the issue of transportation.

(2) Working with Businesses

- Accommodations and discrimination in the workplace
- Purposeful employment, training and advancement opportunities
- Customized Employment
- Increasing the availability of trained job coaches
- Skill training services provided in integrated competitive employment and community settings. Many individuals with cognitive disabilities struggle with traditional post-secondary classroom and/or segregated training programs. In addition to On-The-Job Training services, Certificate Programs and Project SEARCH sites have proven to be another successful alternative for adults and students to achieve employment without pursuing post-secondary training. The collaboration between businesses and community colleges in the Certificate Programs and business and high schools in the Project SEARCH programs results in individuals with cognitive and other impairments acquiring the desired work skills and jobs.

(3) Partnering with Providers

- Improve communication and quality of partnerships
- Helping service providers think creatively to meet client's employment needs
- Emphasis on informed choice
- Challenge of locating, accessing and coordinating needed community services and supports. Consistent with prior comprehensive assessment of rehabilitation needs, individuals with the most significant disabilities continue to have complex needs, complicated by poverty. Social services and support networks, both governmental and non-profit, have not been able to maintain much less increase service levels to meet these needs. However, Nebraska VR intends to maintain its strategic office locations across the state and travel to all counties.

B. Who are minorities;

Executive Summary

The following is an Executive Summary from the Nebraska Department of Health and Human Services Office of Health Disparities and Health Equity, *Profile of the Minority Population in Nebraska, Office of Health Disparities and Health Equity, Health Equity for all Nebraskans*, May, 2015.

Nebraska continues to become more diverse. In 2010, the population of Nebraska was 1,826,341 and minorities represented 17.9% of the total population. Hispanics were the largest minority group at 9.2% of the state population. African Americans were the second-largest minority group at 4% of the state population. Followed by Asians, American Indian or Alaska Natives and Native Hawaiian/other Pacific Islander. Hispanics accounted for 51% of the total 326,588 minority population.

The minority population in Nebraska has been increasing more rapidly than the non-Hispanic (NH) White population. According to the U.S. Census Bureau, from 2000 to 2010, Nebraska's racial/ethnic minority population grew from 216,769 to 326,588, a 50.7% increase while the non-Hispanic White population had only a 0.4% increase. In the mid-1990s, the U. S. Census Bureau projected Nebraska's minority populations would reach 14.4% of the total population by the year 2025. In 2005, 20 years ahead of those projections, the racial ethnic minority population of Nebraska was estimated to be 14.6%.

Nebraska has a rapidly growing minority population comprised increasingly by persons of Hispanic/Latino origin. Hispanics are the fastest-growing minority group in Nebraska. The Hispanic/Latino population increased from 36,969 in 1990 to 94,425 in 2000, to 167,405 in 2010.6 These numbers represent a 352.8% increase of the Hispanic population in the state between 1990 and 2010, a 155.4% increase between 1990 and 2000, and a 77.3% increase between 2000 and 2010. In 1990, the population of Nebraska was 1,578,385. Of that number, the Hispanic population accounted for 2.3%. In 2000, the population of Nebraska was 1,711,263 and the Hispanic population accounted for 5.5%. In 2010, the population of Nebraska had risen to 1,826,341 and the Hispanic population accounted for 9.2% of Nebraska's total population.

Compared with the non-Hispanic White population, Hispanics had a larger proportion of young people and a smaller proportion of older people. In 2010, about one-third (36%) of Hispanics were under 15 years old, about 89% of Hispanics were younger than 45, while only 3% of Hispanics were 65 and older.7In the same year, 18.3% of non-Hispanic Whites were under 15 years old, 56% were younger than 45, and 15.6% were 65 and older.

Asians were the third fastest-growing minority group, with a 47.26% population increase during the 2000-2010 period.8 In 2000, the Asian population accounted for 1.3% of the total Nebraska population, and accounted for 1.8% of the total Nebraska population in 2010. In 2010, about 23% of Asians were under 15 years old, about 77% of Asians were younger than 45, while only 5% of Asians were 65 and older.

Nebraska's minority population had a larger proportion of young people and a smaller proportion of older people. In 2010, nearly one-third (33.2%) of the minority population were under 15 years old, about 80.6% were younger than 45, while only 4.1% were 65 and older. In the same year, 18.3% of non-Hispanic Whites were under 15 years old, 56% were younger than 45, and 15.6% were 65 and older.

According to the U.S. Census Bureau's American Community Survey, of the total foreign-born population in Nebraska in 2010, the largest share (51.5%) were from Central America, 24.6% from Asia, 9.9% from Europe, 8.7% were from Africa.

The top five countries of birth of the foreign born in Nebraska were Mexico, India, EI Salvador, Vietnam, and China. In 2010, Mexico accounted for 41% of all foreign-born Nebraska residents. India was the birthplace of the next largest with 5.1%, followed by EI Salvador with 5.1%, Vietnam with 3.8% and China with 2.8%.

Of the foreign-born Nebraska residents in 2010, 26.7% entered the country prior to 1990, 34.7% between 1990 and 1999, and 38.5% in 2000 or later. Approximately 73% of foreign-born Nebraskans entered the U.S. after 1990.

The overall trend of immigration into Nebraska has been increasing. The number of people granted legal permanent residence has ranged from 2,270 in FY '97 to 4,400 in FY '10. The cumulative total of admissions to Nebraska between fiscal years 1997 and 2010 was 27,290 immigrants, this included new arrivals and persons who adjusted their status. The charts in this report show recent immigrant admissions and cumulative immigrant admissions data since 1997.

Based on data from the U.S. Department of Health and Human Services, Office of Refugee Resettlement, Nebraska received 5,415 refugees from FY' 2000 to FY' 2010, with 818 arriving in FY' 2010.

Themes and priorities from Nebraska VR's CSNA include:

(1) Increasing the number of VR bilingual staff
(2) Increasing staff diversity and equity of services
(3) Nebraska VR will continue to align efforts with the Nebraska Department of Education to:
- address inequities by focusing on opportunities for all clients and students;
- adopt a relentless focus on outcomes that ensure all stakeholders deliver on the promise of equity; and
- focus on equity of opportunity, services, and successful outcomes across race, gender, ethnicity, language, disability, sexual orientation, family background, adverse events, and/or family income.

(4) Diverse Employment Opportunities (VR creates business relationships with businesses to meet clients' needs
(5) Cultural Competency Awareness

C. Who have been unserved or underserved by the VR program;

Themes and priorities for serving unserved and underserved from Nebraska VR's CSNA include:

- Maintain a continued focus on competitive integrated employment.
- Maintain relationships with service providers, businesses, community resources, schools, and educational service units.
- Foster cultural competencies and address barriers presented by poverty.
- Prioritize hiring bilingual staff.
- Establish and maintain service agreements with qualified foreign language interpreters and utilize phone and video remote foreign language interpreting when on-site interpreting is not available. This would also include sign language interpreting
- Continue to translate agency audio/visual media, brochures and forms in other languages.

Nebraska VR received a Traumatic Brain Injury (TBI) State Partnership Program Mentor Grant from the federal Administration for Community Living in June 2018. The purpose of the 3-year grant is to create and strengthen a system of services and supports that maximizes the independence, well-being, and health of people with TBI. Nebraska VR is the lead agency for brain injury in the state, and collaborates with other state agencies, organizations and advocates to carry out grant-funded activities. While progress has been made in strengthening Nebraska's service and support system, information collected in a 2019 statewide Needs Survey indicates there are still service gaps for this population.

SSDI and/or SSI recipients may be an underserved population by virtue of the fact that Nebraska VR's percentage of clients receiving SSDI and/or SSI is below the national and agency mean. However, SSA data indicates that the state's percentage of individual's age 18 – 64 on SSDI or SSI on the basis of a disability is also below the national average.

Strides have continued to be made in using screening tools and specialized vocational assessments to identify Nebraska VR clients with brain injury and other cognitive disorders in order to better align services and supports required to achieve employment. The identification and use of assistive technology options have also proven to be beneficial to individuals with a brain injury.

Staff identified individuals who are of Hispanic/Latino origin as unserved/underserved and Nebraska has a rapidly growing minority population comprised increasingly by persons of Hispanic/Latino origin. Hispanics are the fastest-growing minority group in Nebraska.

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

Themes and priorities from Nebraska VR's CSNA include:

- Improved communication with Workforce partners
- Improved disability awareness
- Provide training to all employers about how disability impacts work and accommodations

As a result of Nebraska VR implementing an Order of Selection (OOS), since 2018, there has been an increase in the number of referrals VR has made to other agencies and community providers.

Information and Referral services (I&R) are provided whether or not the individual chooses to apply for VR services, priority group(s) are closed and/or the individual chooses not to be placed on the wait list. Nebraska VR provides I&R to community resources and partners in the statewide workforce development system including but not limited to: the American Job Center, Adult Education, Independent Living Centers, Employment Networks, and counseling, college and career centers. Local VR offices have a customized listing of community-specific resources which can be provided to individuals. This helps to ensure the agency is assisting the person in navigating the community support options available to him/her.

Prior to implementing the OOS, Nebraska VR provided training to referral partners. This was an opportunity for VR to share information about the OOS and to answer any questions about the reasons for implementing OOS.

VR field offices continue to invite community partners to team meetings so more information can be shared about each other's services. This exchange of information helps to foster collaboration while also building the list of potential resources VR can offer as part of the I&R process.

Nebraska VR staff serve on the regional workforce boards. It is important that VR staff are aware of and promote among its clients, the jobs-driven, work-based learning, career pathways and industry sector initiatives put forth by the workforce development system. Additionally, the Nebraska VR Director is now a member of the Statewide Workforce Board.

E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

Nebraska VR and Nebraska Commission for the Blind and Visually Impaired (NCBVI) have jointly agreed on the minimum age of 14 for students with disabilities to begin the provision of Pre-Employment Transition Services per the NCBVI and Nebraska VR Cooperative Agreement.

The information for this section was collected from the Nebraska Education Profile which is maintained by the Nebraska Department of Education.

There has been a steady increase in the number of students receiving special education in Nebraska over the past three (3) years:

- 2016-17 – 4.97%
- 2017-18 – 15.12%
- 2018-19 – 15.48%

When comparing the student count data to the number of students receiving Pre-Employment Transition Services there is a continued need for on-going communication between Nebraska VR staff and school administrators and staff to ensure services are available to students who may benefit from Pre-Employment Transition Services or, as necessary, VR services. In some cases, VR is reporting serving individuals who have left high school and, therefore, no longer captured in the student count yet VR is providing services because the individuals remain eligible for Pre-Employment Transition Services.

Nebraska VR maintains its commitment to serving students and partnering with schools by ensuring every public high school in the state is assigned a VR Specialist. The agency continues to measure its effectiveness with partnering and meeting the needs of students utilizing daily feedback and a formal survey disseminated each spring.

Table 42. Students With Disabilities

Age	Count of Students with Disabilities in Nebraska	Receiving Pre-ETS Services
14	3,410	58
15	3,187	311
16	2,885	818
17	2,718	1,230
18	1,167	961
19	375	435
20	270	274
21	36	88

While Nebraska continues to have one of the highest 4-year high school graduation rates in the country (88%), there is still concern for those students with disabilities who have dropped out of school or who graduate but do not make a successful transition to employment and independence and become involved within the Juvenile Justice system or dependent on public assistance. The provision of Pre-Employment Transition Services will hopefully lead to a more successful transition for all students and youth with a disability into employment and adult life.

As mentioned previously, Nebraska VR has a significant presence in the high schools across the state assessing and counseling, attending IEPs, and working with the schools and other community partners. This provides a foundation for developing and offering a wide range of Pre-Employment Transition Services.

On average, 56.07% of clients served by Nebraska VR are age 21 or younger when applying for VR services. This is an approximate 21% increase from the percentage reported in the previous State Plan.

Themes and priorities from Nebraska VR's CSNA include:

- Communication with parents
- Individualized time with students and parents to discuss options or lack of options
- What to expect from VR, a better understanding
- Building a resume
- Understanding the importance of job benefits
- IT skills
- Interview skills
- Social skills
- Money skills

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

Themes and priorities from Nebraska's CSNA include:

- Increase/improve communication between Nebraska VR and the community rehabilitation programs
- Establish accountability and evaluation measures for determining quality services delivered by community rehabilitation programs
- Developing community rehabilitation programs in rural areas (training on customized employment as a viable option for meeting the needs of clients and businesses)
- Maintaining community rehabilitation programs in urban areas
- Particular emphasis will be focused on establishing and developing supported employment services for youth exiting high school prior to age 21 and expanding supported employment services for individuals with autism spectrum disorders or acquired brain injuries.
- Strides have been made in developing and improving evidence-based, flexible vocational skill training, behavior management, and rehabilitation technology services and supports to be provided in natural environments including integrated competitive employment sites.

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

See (j)(1)(E) above

k. Annual Estimates

Describe:

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

The 2018 Annual Disability Statistics Compendium published by the Rehabilitation Research and Training Center on Disability Statistics and Demographics estimates the number of Nebraskans with a disability of any age in 2017 at 227,500. The total civilian population count for Nebraska was 1,891,453 (2017). Therefore, the disability count for the state is approximately 12.0 percent. In comparison with national data, people with disabilities comprised of 13.2 percent of the US population (Annual Report: 2018 Disability Statistics & Demographics).

When considering the number of individuals in Nebraska who are eligible for services, the number of students with disabilities was also analyzed. The number of students served under the Individuals with Disabilities Education Act, Part B and reported by age for Nebraska (Fall 2016 IDEA Part B Data) are:

- Ages 12-17: 19,221
- Ages 18-21: 1,798

The 2018 Annual Disability Statistics Compendium report estimates 55,391 (49.3%) Nebraskans with a disability in the 18 - 64-year age range are working in some capacity which is approximately 13.8 percent higher than the national employment percentage of 35.5% reported for individuals with disabilities.

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

A. The VR Program;

Title 1, Part B

During FFY 2017, specifically October 1, 2016—June 30, 2017, Nebraska VR served a total of 8,272 clients. During FFY 2018, the number of clients served dropped to 4,936, and in FFY 2019, that number was 2,444. Nebraska VR has been under an Order of Selection (OOS) which explains the decrease in the overall number of clients served. It should be noted that in FFY 2017, 1,788 individuals were closed successfully from the agency. In FFY 2018 this number was 1,596, and in FFY 2019 this number was 690. Based on these data, the relative proportion of clients successfully closed out of those served was 22% in FFY 2017, 32% in FFY 2018, and 28% in FFY 2019, which suggests the agency is maintaining the quality of its service delivery. The following table provides the total applicants, total closed, those closed successfully, the total number served, and the proportion of those successful out of the population actually receiving service.

Table 42.1. Service delivery

Status	FFY17	FFY18	FFY19
Applications	4500	3147	2208
Total Exited	5615	5261	3029
Successful	1788	1596	690
Total Served	8272	4936	2444
Success/served	21.61509	32.33387	28.23241

Since Nebraska VR began implementing the OOS (December 2017), 4,393 individuals have been determined eligible for services. Based on the analysis of eligibilities, the agency determines eligibility and assigns a priority group each month at the approximate rate of:

- Priority Group 1: 100 eligibilities and priority group assignments
- Priority Group 2: 25 eligibilities and priority group assignments
- Priority Group 3: 10 eligibilities and priority group assignments

On a monthly basis, the agency monitors and determines how many individuals can be removed from the wait list. The projected number of individuals to be removed from the wait list in PY 2019 and PY 2020 is 4,100. It is anticipated Priority Group 1 will no longer have a wait list effective no later than October 1, 2020.

The estimated number of eligibility individuals who will receive services with funds provided by Title 1, Part B:

- FFY20 = 2,345
- FFY21 = 2,185

See Tables 43 through 46, http://vr.nebraska.gov/Tables43_46.pdf, for a breakdown of estimated expenditures by fiscal year and Priority Group.

B. The Supported Employment Program; and

Title VI, Part B

Since implementing the OOS, Nebraska VR has removed approximately 1500 individuals (Priority Group 1) from the wait list. Because the agency is now serving primarily individuals with the most significant disabilities, there is an increased number of supported employment cases and the cost per case has also increased.

The estimated number of eligible individuals to receive supported employment services:

- FFY20 = 758
- FFY21 = 612

This includes all individuals receiving supported employment services regardless of the funding source. Based on the last two years' expenditures, Nebraska VR will spend over 1,000,000 for supported employment services which greatly exceeds the Title VI grant of $285,000.

C. Each priority category, if under an order of selection.

Under the OOS, Nebraska VR will continue to provide services to all individuals who were already receiving services under an approved Individualized Plan for Employment (IPE) prior to final approval of the OOS by RSA and implementation by Nebraska VR. Nebraska VR was approved by RSA and began implementing the OOS in December of 2017. The agency has removed approximately 1,500 people from the wait list since October of 2018. As outlined in Section M of this state plan, an aggressive plan has been developed to continue efforts to remove individuals from the wait list each month.

As outlined in Tables 43, 44, and 45, it is estimated:

FFY20

- For Priority Group 1, there will be 3600 new cases. Of those 3600 cases, the estimated number of clients served will be 1365. Combined with existing clients, the total number of Priority Group 1 clients in FFY20 will be approximately 1694.
- For Priority Group 2, there will be 934 new cases. Of those 934 cases, the estimated number of clients served will be 354. Combined with existing clients, the total number of Priority Group 2 clients in FFY20 will be approximately 430.
- For Priority Group 3, there will be 477 new cases. Of those 477 cases, the estimated number of clients served will be 157. Combined with existing clients, the total number of Priority Group 3 clients in FFY20 will be approximately 221.

FFY21

- For Priority Group 1, there will be 1,092 new cases. Of those 1,092 cases, the estimated number of clients served will be 411. Combined with existing clients, the total number of Priority Group 1 clients in FFY21 will be approximately 1,637.
- For Priority Group 2, there will be 324 new cases. Of those 324 cases, the estimated number of clients served will be 123. Combined with existing clients, the total number of Priority Group 2 clients in FFY21 will be approximately 375.
- For Priority Group 3, there will be 120 new cases. Of those 120 cases, the estimated number of clients served will be 40. Combined with existing clients, the total number of Priority Group 3 clients in FFY21 will be approximately 172.

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

With strategies in place to eliminate the wait list for Priority Group 1, it is not anticipated Nebraska VR will have sufficient resources using Title I, Part B funds, in PY 2020, to serve all individuals assigned to Priority Groups 2 and 3. As a result, the number of individuals who are eligible for VR services but will not receive such services due to the OOS are:

FFY20

- Priority Group 2: 934 individuals
- Priority Group 3: 477 individuals

FFY21

- Priority Group 2: 324 individuals
- Priority Group 3: 120 individuals

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.*

Tables 43 through 46, http://vr.nebraska.gov/Tables43_46.pdf, depict the number of new cases for FFY 2013 through FFY 2023 for Priority Groups 1, 2, and 3. The table reflects the number of cases expected to have an expenditure in the year of eligibility and subsequent years of service. Less than half of new cases have an expenditure the first year and even fewer the second year and substantially less after that. The table is used to formulate the projections for the number of eligibilities and the projected cost of services for FFY 2020-23.

The cost of services for the number of individuals estimated to be served by each priority group is as follows:

FFY 20

- Priority Group 1 Cost of Services: $2,711,659.90
- Priority Group 2 Cost of Services: $526,564.32
- Priority Group 3 Cost of Services: $265,057.97
- Total for FFY 20: $3,503,282.19

FFY21

- Priority Group 1 Cost of Services: $3,214,780.68
- Priority Group 2 Cost of Services: $525,134.61
- Priority Group 3 Cost of Services: $231,380.08
- Total for FFY 21: $3,971,295.37

l. State Goals and Priorities

The designated State unit must:

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*

Nebraska VR's State Goals and Priorities have been aligned to the strategic vision of Nebraska's Workforce Development System. The vision maintains a shared focus on seamlessly providing services to jobseekers, including individuals with disabilities, at all stages of employment and providing a trained and qualified workforce for businesses. The Needs Assessment Survey results were evaluated with Nebraska VR's Leadership Council and the Nebraska State Rehabilitation Council's Executive Committee meeting in January 2020.

During the development of the WIOA State Plan, the SRC Executive Committee and Council were consulted and provided an opportunity to comment. A summary of the comments provided by the SRC include:

- Goal 1: There were no additions.
- Goal 2: An SRC member asked questioned how this would be measured.
- Goal 3: There were no additions.
- Goal 4: The SRC members asked that SRC and educators be included.
- Goal 5: There were no additions.

- Strategy 1: The SRC members asked that SRC and educators be included. It was suggested to identify rural as a specific strategy for job development and job coaches in the rural areas of Nebraska.
- Strategy 2: It was suggested to add the VR/ATP monthly meetings and VR is a member of the ATP Advisory Council.
- Strategy 3: It was suggested to add SRC and educators to the second bullet. It was suggested to add sign language interpreting to the fifth bullet. It was suggested to consider Trans-Act as a resource to the sixth bullet.
- Strategy 4: It was suggested to add as a bullet point, continued training for VR staff related to IEP development and participation in meetings.
- Strategy 5: SRC offered Family Employment Awareness Training (FEAT) as an example of this strategy.
- Strategy 6: There were no comments.
- Strategy 7: There were no comments.

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

Goal 1: Increase the number of individuals who exit VR supported employment with competitive integrated employment.

- Baseline: In PY 2019 Total SE cases closed: 103; Total successful: 47; Percentage: 45.63% people who received VR supported employment (SE) or customized employment exited with competitive integrated employment.
- PY 2020 Target: 47.0% of people who receive VR supported employment (SE) or customized employment will exit with competitive integrated employment.
- PY 2021 Target: 49.0% of people who receive VR supported employment (SE) or customized employment will exit with competitive integrated employment.
- PY 2022 Target: 51% of people who receive VR supported employment (SE) or customized employment will exit with competitive integrated employment.
- PY 2023 Target: 53% of people who receive VR supported employment (SE) or customized employment will exit with competitive integrated employment.

Priorities:

- Increase monitoring and addressing lack of progress in supported employment cases. Increase transparency with numbers to help propel services forward. Mandatory Team Meeting if individual is not employed within 90 days.
- Continue to implement the Rapid Engagement model.
- Utilize Employ Meetings, i.e. EmployLNK, EmployOMA, EmployNP.
- Continued focus on students and youth to help change the mindset about obtaining competitive integrated employment.
- 'VR Victories' shared at beginning of any meeting where there are community partners or stakeholders so positive, real examples of competitive integrated employment can be highlighted. Use same case collection process as in place for Transition Newsletter.
- Continue to monitor data across the state to determine where there are successful outcomes so best practices can be replicated.
- Explore performance based contracting and the potential for implementing this as a way of achieving successful outcomes.
- Evaluate training needs of the supported employment service providers.
- Address the low number of supported employment providers and specialty providers, i.e., Acquired Brain Injury (ABI), across the state and ways to increase access to training in order to increase the number of those providers available to VR clients with those needs.
- Consider in-house training for VR staff to develop expertise in understanding and implementing the employment support needs of clients with ABI and Autism.
- Move more individuals to economic self-sufficiency through the implementation of lessons learned from the federally funded Career Pathways Advancement Project (CPAP). Over the past five (5) years CPAP was funded under a grant from RSA and uses an "Upskill/Backfill" model to train individuals in emerging and growing industry sectors. As the end of the fifth year of the project approaches, Nebraska VR will explore methods for sustaining aspects of the grant project.

Goal 2: Increase the number of students/interns completing Project SEARCH and obtaining competitive integrated employment.

- Baseline: During outcome years September 2015-August 2018, Nebraska Project SEARCH sites report an aggregate 98.8% (289/293) completion rate for Project SEARCH interns. Of those completers, 187 (64.7%) are reported as employed following the Project SEARCH program.
- PY 2020 Target: 66% of Project SEARCH interns become competitively employed following completion of the program.
- PY2021 Target: 68% of Project SEARCH interns become competitively employed following completion of the program.
- PY2022 Target: 69% of Project SEARCH interns become competitively employed following completion of the program.
- PY2023 Target: 70% of Project SEARCH interns become competitively employed following completion of the program.

Priorities:

- Focus on Business Advisory Council development/maintenance and Steering Committee Meetings. Steering Committee is a basic expectation in the Project SEARCH fidelity model all sites should be required to meet.
- Team discussions with schools about referring most appropriate candidates to Project SEARCH.
- Increase role in monitoring and addressing lack of progress. Be more transparent with numbers to help propel services forward. If Project SEARCH interns have not found a job by late spring, pull team back together to brainstorm and plan Rapid Engagement activities.
- Require Steering Committee participation in MOU with each Project SEARCH location. Form Peer Network by providing examples of successful steering committees and contact information to those who are struggling.
- VR Application completed prior to the start of the program, preferably a year prior to start.
- Maximize the capacity of each program by working with schools to identify students that could be interns.
- Each program completes a bi-annual self-audit in the first semester of the program year (evaluating the previous year).
- Statewide Coordinator organizes quarterly meetings during the school year for Project SEARCH teachers to discuss strategies, struggles, and progress.
- Conduct an annual Statewide Meeting that brings in national Project SEARCH expertise for all stakeholders in order to support the goals of Project SEARCH.
- Continue on-going discussions with Developmental Disabilities regarding support and funding for Adult Project SEARCH interns statewide.

Goal 3: Improve quality and consistency of supported employment services through the development and implementation of best practices for service providers.

Priorities:

- Monitor the data across the state and determine whether best practices correlate with consistently good outcomes among service providers. Evaluate the methods being utilized in these areas and incorporate them in other areas through training as well as service agreement and policy modification.
- Explore performance-based contracting and the potential for implementing this as a way of achieving more successful outcomes.
- Evaluate training needs of the providers and identify ways for improved relationships with local businesses and enhance the services provided. Develop and provide appropriate training to meet the needs of the providers to include the two (2) training tracks listed:
    - For employment specialists: Job development, working with employers, job coaching, customizing a job description, fading supports, along with understanding how to go from IPE to closure—looking at the job goal, identifying prospective employers, job leads, using personal and family social capital to aid in the search, creative problem-solving, as well as all the other aspects of how to provide quality, individualized supports.
    - For staff who are supervising the employment specialists: Quality assurance/documentation of supports, reporting and billing for services.
    - For both groups: Foundational training aimed at addressing attitudinal barriers to employment for people with the most significant disabilities.
- Increase role in monitoring and addressing lack of progress in supported employment cases.
- Address the low number of supported employment providers and specialty providers, i.e., ABI, across the state and ways to increase access to training in order to increase the number of those providers available to clients with those needs.
- Provide policy modification and training, to include training in best practices and quality standards, to VR staff to ensure understanding of the level of involvement to maintain throughout the progress of the supported employment case.

Goal 4: Improve communication with clients, businesses, stakeholders, service providers, core partner programs, SRC, educators, and staff members.

Priorities:

Clients—

- Initiate phone calls to Priority 1 clients on the wait list every 6-8 weeks to confirm contact information is correct and to inquire on I & R resources and if they were helpful. Consider less frequent contact with Priority

2 and Priority 3 clients; however, I & R resources will be more important for them. Will start by outlining up front process once eligibility is completed so clients will be expecting contact.

- Motivational Interviewing: Nebraska VR is committed to integrating motivational interviewing as a strategy to help clients determine if they are ready to make decisions about the next steps to getting a job and as a strategy to keep clients engaged in the process. This is a client-centered directive counseling approach to assist clients to recognize and reduce barriers to change. Motivational interviewing has been shown to increase client motivation and promote more active participation in services.
- Meet You Where You Are: MYWYA is a major initiative of Nebraska VR that captures how the agency intends to provide services to all individuals with disabilities who come to VR for services. The initiative respects that each individual comes with a different set of experiences, skills, knowledge and interests and uses that information to determine, in collaboration with the individual, what services are of most benefit. Instead of the traditional linear process, the agency aligns the strengths of the VR team and other resources in a way that recognizes the uniqueness of each individual and assists with achieving their employment goals in a timely manner. Rapid Engagement, based on Vermont's Progressive Employment model, is a tool or strategy, as an element of the MYWYA model that seeks to connect an individual with a business in the community as soon as possible. This could be a mock interview, an individual tour, volunteer work, an on the job evaluation or on the job training. Rapid Engagement allows an individual to gain exposure to the world of work, acquire work experience, and creates an opportunity for the employer to get to know the individual without an obligation to hire. Rapid Engagement can also be a potential placement strategy as an employer may ultimately find the individual to be a good fit for their business.
- Increase communication with clients via text, as this has been reported as a preferred method of communication by many clients/students.
- Increase the use of professional interpreters and other means of communication for those clients that require those services.
- Provide training opportunities to staff so it can be ensured written methods of communication with clients are 508 compliant.
- Rapid Engagement is a major initiative of Nebraska VR that captures how the agency intends to provide services to all individuals with disabilities who come to VR for services. The initiative respects that each individual comes with a different set of experiences, skills, knowledge and interests and uses that information to determine, in collaboration with the individual, what services are of most benefit.

Businesses—

- Offer more basic ADA Training; Tap into small businesses.
- Explore trade organizations for possible network development (Nebraska Motel and Hotel Organizations, Cattlemen's Association, Federation of Independent Businesses).
- Invite more businesses to participate in the Employ meetings throughout the state with Zoom being an option for participation.
- Encourage more business participation in the Business Advisory Council (BAC) meetings throughout the state, look at offering Zoom options for these meetings as well.
- Maintain the Business Account Manager model and consider expansion to other areas of the state. Nebraska VR has hired Business Account Managers (BAM) in Omaha, Norfolk, and Kearney to establish relationships with businesses, trade associations, business and human resources organizations to identify staffing patterns, skill requirements, support needs, training preferences, etc., to be an effective representative to Nebraska VR teams on behalf of businesses. The BAMs will seek out opportunities to establish work-based learning partnerships, OJE/OJTs, apprenticeships, and internships with businesses. These positions take a jobs-driven approach in aligning the education and training requirements of businesses with the qualifications of VR eligible clients to better meet the workforce needs of employers.

Educators/Schools—

- Presentation at School Board Conference in Omaha each November. Marketing with Counselors and Nurses. Consistency statewide with utilizing newsletters.
- Providers share "VR Victories" via I/DD LISTSERV quarterly.
- Utilize alternative methods, i.e., Zoom, for attending meetings in order to manage time more efficiently, cut down on travel time, and be present at more meetings.
- Utilize social media such as Instagram and SnapChat for marketing blasts.

- Conduct monthly collaborative meetings with Career and Technical Education and Office of Special Education.
- Connect what VR is doing with each student's coursework and develop more consistency in coordinating school transition services.

Core Partner Programs—

- Organize quarterly calls to keep partners up-to-date on what we are working on. Share "VR Victories" to start each meeting. Continue to explore co-locating in areas of the state in which this is not yet occurring.
- Expand the Employ meetings throughout the state as a way of meeting and sharing resources with core partners.
- Continue participation on the Nebraska Partners Council. The Partner Council represents program stakeholders in Nebraska's Workforce Delivery System model. The Nebraska Partner Council works to strengthen cross-agency partnerships that focus on workforce solutions to ensure subpopulations are being afforded quality work opportunities and employers have a diverse and ready workforce. Beginning during the summer of 2020, the Nebraska VR Director will be the Council Chair.
- Collaborate with core partners on the development and availability of soft skills training for all individuals. The core partners will explore the possibility of joint soft skills training. The potential collaboration could reduce duplication and increase the availability of training opportunities across the state.

Stakeholders—

- More transparency on external VR website.
- Increase relationships/networking with advocacy and support groups, i.e., ARC, NAMI, BIA-NE, to include relationships with local chapters.

Goal 5: Develop cultural competencies to ensure equitable access to Nebraska VR services.

Priorities:

- VR forms can be difficult to understand if English is not one's first language. Use Google Translate or other translation services for pdf conversion for any form required in a different language.
- Provide Bridges Out of Poverty to all staff.
- Explore utilizing the Online Diversity Calendar. This resource offers access to tools for awareness and inclusion ready to auto-schedule to VR staff and social media that will integrate with Outlook. Examples include: a diversity newsletter, awareness of cultural and religious holidays (when not to schedule appointments and expect clients to come to the VR Office, monthly themes, important dates, awareness of customs).
- Each office will explore ethnicities/cultural groups present in the catchment area.
- VR applications should include a question regarding primary language spoken by client and this should be recorded in QE2.
- Field offices should develop relationships with local community groups/leaders and staff should regularly spend time at these locations in order to take applications, meet with clients, etc.
- Staff should download iTranslate (or a similar app) on their iPads and be familiar with its use so that if a client comes into the office and is unable to speak English, or speak it fluently, the app could be used to communicate with them on that initial visit.
- Staff should explore resources available at Department of Health and Human Services Office of Health Disparities and Health Equity. The possibility for training for all staff from this agency could be explored.
- Actively develop a cultural competency training that is mandatory for all staff. Training for staff should include the differences between ethnicity and culture, to include the fact that cultural diversity is much broader than ethnicity, and can include such groups as Deaf Culture, socioeconomic status, etc.
- Nebraska VR will align the priorities of this goal with the Equity Initiatives outlined in Nebraska Department of Education's Vision and Strategic Direction document.

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;

See 3A, 3B, 3C.

The above goals and priorities are consistent with the most recent statewide comprehensive assessment as previously described.

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

For the first two (2) years of PY 2020-23 Plans, the VR program authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV of WIOA, will have two (2) full years of data available for the Measurable Skill Gains indicator only. Therefore, Nebraska VR has designated the following indicators as baseline for the VR program for PY 2020 and PY 2021.

- Employment (2nd quarter after exit)
- Employment (4th quarter after exit)
- Median earnings (2nd quarter after exit) and
- Credential attainment rate

Nebraska VR will continue to collect and report on all indicators including those that have been designated as baseline. The actual performance data reported by this program for indicators designated as baseline for PY 2020 and 2021 will serve as baseline data for future years. Nebraska VR will submit expected levels of performance for these indicators for PY 2022 and 2023.

The effectiveness of serving employers indicator is a shared outcome across all six (6) programs in the state. In accordance with Appendix 1, states are not required to submit an expected level of performance for the effectiveness in serving employers for PY 2020 and 2021. Nebraska core programs are expected to collect data and report on this indicator for PY 2020 and 2021 as they did for PYs 2016-2019.

Each core program will submit an expected level of performance for all the other indicators with the exception of the four (4) indicators designated as baseline for the VR program in PY 2020 and 2021. VR will work with the Department during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as baseline. VR will update its plan to include the agreed upon negotiated levels of performance.

Measureable skill gains baseline —

- PY 2017 — 21.3%
- PY 2018 — 29.9%

Expected levels of performance —

- PY 2020 — 14%
- PY 2021 — 15%
- PY 2022 — 15.5%
- PY 2023 — 16%

The expected levels of performance were not only based on two (2) years of baseline data but also PY 2019 Q1 and projections for Q2. There was a decrease in performance from PY 2018 which is accounted for in the expected levels of performance.

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.

The State Rehabilitation Council and Nebraska VR work in collaboration to conduct a client satisfaction survey. This survey will continue and will be reviewed to make revisions as necessary based on rules and regulations including any pertinent standards and indicators under the performance measures. Refer to (a) Input of State Rehabilitation Council.

m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:

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

The order to be served

Nebraska VR remains in an Order of Selection (OOS). The agency received approval from RSA to implement OOS in December, 2017. As of April, 2018, all three (3) priority groups have been closed.

Individuals who applied for services in PY 2018 and PY 2019 were assessed and their eligibility was determined and a priority group was assigned. Eligible client's names have been placed on a wait list and the VR agency has continued to have monthly meetings to determine when and how many individuals on the wait list can be removed. When removing individuals from the wait list, first priority is given to clients who are determined most significantly disabled (Priority Group 1), second priority to those determined significantly disabled (Priority Group 2), and third priority to those determined non-significantly disabled (Priority Group 3). Rationale for priority group assignment will appear in the client's case file.

Each client is notified in writing of all the priority groups, his/her assignment to a priority group, and if the priority group is open or closed. The written notification also includes an individual's priority assignment can be re-evaluated if new or additional information becomes available which affects the individual's functional limitations. Additionally, the written notification indicates his/her right to appeal the priority group assignment through informal or formal review and of the availability of assistance from the Client Assistance Program.

Clients who do not meet the OOS criteria for receiving VR services will be provided:

a. VR information and guidance (which may include counseling and referral for job placement) using appropriate modes of communication to assist them in preparing for, securing, retaining/regaining or advancing in employment.
b. Referral toother appropriate Federal and State programs, including programs carried out by other components of the statewide workforce development system, best suited to address the specific employment needs of the individual along with information identifying a specific point of contact within the agency.

All funding arrangements for providing services shall be consistent with the OOS. If any funding arrangements are inconsistent with the OOS, Nebraska VR shall renegotiate these funding arrangements so they are consistent with the OOS.

The following outlines Nebraska VR policy and process for implementing the OOS:

<u>Procedure for processing applications:</u>

1. Upon receipt of referral, specialist meets with applicant to complete application and inform them about OOS.
2. Specialist will input data and application date; and determine eligibility within 60 days from the date of application.
3. After eligibility determinations are made, clients will be assigned to an OOS group based on their functional limitations and need for VR services over an extended period of time.
4. Client's name will be put on a wait list if placed in a closed priority category. Eligibility/ Priority Group letter will be sent to all new clients.

<u>Procedure for putting clients on the wait list:</u>

1. For each closed priority group, clients will be put on the wait list based upon application date.
2. Administrative Office will be responsible to maintain the wait list.

<u>Procedure for taking clients off the wait list:</u>

1. Administrative Office will determine when to open or close a priority group based upon Nebraska VR's financial and personnel resources. One priority group will be opened at a time to clear the wait list for that priority group before opening the next priority group.
2. The wait list will be evaluated each month and based on the availability of resources, the Administrative Office will determine approximately how many clients will be taken off the wait list based on the date the individual applied for services.
3. Clients will be notified by letter from the Administrative Office their names are coming off the wait list with a copy of the letter being sent to their Specialist.
4. The Specialist will contact the client.
5. Specialists will complete the IPE within 90 days from the date the client was taken off the wait list.

Pre-Employment Transition Services

- Students who are considered "potentially eligible" for VR services will receive Pre-Employment Transition Services regardless of the OOS, and are served when a signed Pre-Employment Transition Consent and Release is in place.
- Students with disabilities who apply for VR services and who began receiving Pre-Employment Transition Services prior to applying for and being determined eligible, will continue to have access to pre-employment transition services even if their priority group is closed. (Cannot receive any individualized VR services until priority group is being served and they come off the wait list)
- Any student with a disability that has applied for VR services who is not yet participating in Pre-Employment Transition Services when the eligibility determination is made, and who is placed in a closed priority group will be served when funding is sufficient, by the date the application is signed by the client. (Cannot receive pre-employment transition services)
- Any student with a disability who is determined eligible for VR services and placed in an open priority group can receive the full range of services offered though VR, including Pre-Employment Transition Services and individualized VR services.

Under the OOS, Nebraska VR will continue to provide services to all individuals who were already receiving services under an approved Individualized Plan for Employment (IPE) prior to final approval of the OOS by RSA and implementation by Nebraska VR. Nebraska VR was approved by RSA and began implementing the OOS in December of 2017. The agency has removed approximately 1,500 people from the wait list since October of 2018. As outlined in Section M of this state plan, an aggressive plan has been developed to continue efforts to remove individuals from the wait list each month.

Nebraska VR's projections for FFY 2020-23 are specified in Tables 47 through 50, http://vr.nebraska.gov/Tables47_50.pdf. Nebraska VR will implement an OOS in FFY 2020. The agency estimates an OOS will be implemented in FFY 2021 with Priority Group 1 open and individuals in Priority Group 2 also being served from the wait list.

As outlined in Tables 47 through 50, the order to be followed in selecting eligible individuals to be provided VR services is as follows*:*

FFY20

- For Priority Group 1, there will be 3,600 new cases. Of those 3,600 cases, the estimated number of clients served will be 1365. Combined with existing clients, the total number of Priority Group 1 clients in FFY20 will be approximately 1,694.
- For Priority Group 2, there will be 934 new cases. Of those 934 cases, the estimated number of clients served will be 354. Combined with existing clients, the total number of Priority Group 2 clients in FFY20 will be approximately 430.
- For Priority Group 3, there will be 477 new cases. Of those 477 cases, the estimated number of clients served will be 157. Combined with existing clients, the total number of Priority Group 3 clients in FFY20 will be approximately 221.

FFY21

- For Priority Group 1, there will be 1,092 new cases. Of those 1,092 cases, the estimated number of clients served will be 411. Combined with existing clients, the total number of Priority Group 1 clients in FFY21 will be approximately 1,637.
- For Priority Group 2, there will be 324 new cases. Of those 324 cases, the estimated number of clients served will be 123. Combined with existing clients, the total number of Priority Group 2 clients in FFY21 will be approximately 375.
- For Priority Group 3, there will be 120 new cases. Of those 120 cases, the estimated number of clients served will be 40. Combined with existing clients, the total number of Priority Group 3 clients in FFY21 will be approximately 172.

B. The justification for the order

Reduction in VR staff

Since entering into the OOS and closing all three (3) priority groups, Nebraska VR reduced its personnel costs through instituting a hiring freeze. It took approximately two (2) years for the agency to realize the necessary savings of $2,261,067 as a result of the hiring freeze. Now that the VR agency has met the savings projections while under an OOS, efforts are now underway to refill vacancies so VR field offices are at a staffing capacity which will support an aggressive plan for removing individuals from the wait list. As of January 2020, the agency has 49 position vacancies which equates to approximately 1/4 of the maximum allotted staff (211). 78% of the position vacancies are those which provide direct services to clients while the remaining 22% are administrative (policy development, business services, IT programmers, and fiscal).

Managing the VR Wait List

As of January 13, 2020**:** There are 2,916 individuals on Nebraska VR's wait list. This includes:

- Priority 1: 1,744
- Priority 2: 769
- Priority 3: 403

Nebraska VR has a budget team which meets monthly to evaluate expenditures and determine when and how many individuals can be removed from the wait list. Because of the necessary savings measures required in 2018, VR removed only 300 individuals from the wait list between July 1, 2018-June 30, 2019. Consequently, the wait list numbers grew each month. Due to meeting savings projections and receiving additional funds, VR has removed approximately 1,000 individuals from the wait list since July 1, 2019. As the agency increases staff capacity, as previously indicated, it is anticipated an additional 1,800 clients will be removed from the VR wait list by June 30, 2020.

Required 15% for Pre-Employment Transition Services

The Workforce Innovation and Opportunity Act (WIOA) of 2014 mandated State VR Agencies to set aside 15% of VR funds each year (approximately $2.5 million) for Pre-Employment Transition Services. This new fiscal requirement placed an additional burden on expenditures in all other areas of operating the VR Program. The 15% required for Pre-Employment Transition Services expenditures are:

- FFY 2015: $230,731
- FFY 2016: $2,538,994
- FFY 2017: $2,376,036
- FFY 2018: $2,542,642
- FFY 2019: $3,218,433

Increase in Nebraska Department of Education Indirect Cost Rate

NDE has received a new Indirect Cost Rate Agreement effective July 1, 2017 with the U.S. Department of Education. The agreement is for the period July 1, 2017 through June 30, 2020. The new unrestricted Indirect Cost Rate is 13%. This is approximately a 50% increase from the previous indirect cost rate and is estimated to increase the charge to Nebraska VR by $558,000 in FFY 2018.

C. The service and outcome goals

Statewide, Nebraska VR's total projected number of new cases for Priority Group 1 in FFY 20 will be 3,600 cases. Of those 3,600 cases, the estimated number of clients served will be 1,365. Combined with existing clients, the total number of Priority Group 1 clients in FFY20 will be approximately 1,694. This results in a cost of services totaling $2,711,659.90. Additionally, it is projected 430 clients will be served in Priority Group 2 resulting in a projected total expenditure of $526,564.32. Finally, for Priority Group 3, there will be 477 new cases. Of those 477 cases, the estimated number of clients served will be 221resulting in a total of $265,057.97 in expenditures for Priority Group 3. The total cost of services for all three priority groups in FFY 20 is expected to be $3,503,282.19.

In FFY 21, the estimated number of Priority Group 1 clients will be 1,637. This includes both new and existing cases. For Priority Group 2, there will be 324 new cases and of those 324 cases, the estimated number of clients served will be 123. Combined with existing clients, the total number of Priority Group 2 clients in FFYv21 will be

approximately 375. Finally, for Priority Group 3, there will be 120 new cases. Of those 120 cases, the estimated number of clients served will be 40. Combined with existing clients, the total number of Priority Group 3 clients in FFY 21 will be approximately 172.The total cost of services for all three priority groups in FFY 21 is $3,971,295.37.

Tables 47 through 50, http://vr.nebraska.gov/Tables47_50.pdf, depict the number of new cases for FFY 2013 through FFY 2023 for Priority Groups 1, 2, and 3. The table reflects the number of cases expected to have an expenditure in the year of eligibility and subsequent years of service. Less than half of new cases have an expenditure the first year and even fewer the second year and substantially less after that. The table is used to formulate the projections for the number of individuals to be served and the projected case service expenditures for FFY 2020-23.

D. Time within which these goals may be achieved for individuals in each priority category within the order; and

Timeline to achieve goals

Table 51. Application to close successful (days)

Application to close successful (days)	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23
Priority Group 1	441	453	475	480	490	450	400	400
Priority Group 2	463	557	1287	1287	1287	700	420	420
Priority Group 3	619	655	1380	1745	1745	900	530	530

Table 52. Application to close unsuccessful (days)

Application to close unsuccessful (days)	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23
Priority Group 1	341	416	475	480	490	410	370	370
Priority Group 2	368	417	1287	1287	1287	700	670	670
Priority Group 3	495	600	1138	1745	1745	900	900	900

Table 53. Plan to close successful (days)

Plan to close successful (days)	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23
Priority Group 1	356	362	400	686	400	380	360	350
Priority Group 2	390	470	1276	1197	1197	1000	600	450
Priority Group 3	476	522	1138	1655	1655	1400	550	480

Table 54. Plan to close unsuccessful (days)

Plan to close unsuccessful (days)	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23
Priority Group 1	432	501	450	815	450	450	450	450
Priority Group 2	502	487	1304	1304	1304	800	650	600
Priority Group 3	487	607	1223	1223	1223	850	680	575

Reference

450 days= 1 year, 3 months; 1200 days= 3 years, 3 months; 1600 days= 4 years, 5 months

The average number of days for each of the above categories have been drastically impacted by the implementation of the OOS. Nebraska VR projects Priority Group 2 and 3 will not be served until FY 21. Nebraska VR has provided significant technical assistance to staff and implemented internal controls in the agency's case management system to address timely services. Therefore, it is anticipated once an individual is removed from the wait list there will continue to be improved timelines for achieving these goals.

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

Nebraska VR has determined it is necessary to continue to implement the OOS.

Each client will be notified in writing of all the priority groups, his/her assignment to a priority group, and if the priority group is open or closed. The written notification also includes an individual's priority assignment can be re-evaluated if new or additional information becomes available which affects the individual's functional limitations. Additionally,

the written notification indicates his/her right to appeal the priority group assignment through informal or formal review and of the availability of assistance from the Client Assistance Program.

Nebraska VR serves individuals with the most significant disabilities (Priority Group 1) before all other individuals with disabilities.

- Priority Group 1 (Individuals with Most Significant Disabilities) will be served first;
- Priority Group 2 (Individuals with Significant Disabilities) will be served second; and
- Priority Group 3 (Individuals with Non-Significant Disabilities) will be served third.

Descriptions of Priority Groups:

- Priority Group 1: Clients determined to have a most significant disability. These are clients with severe physical or mental impairments that seriously limit two (2) or more functional capacities and who require multiple services over an extended period of time.
- Priority Group 2: Clients determined to have a significant disability. These are clients with severe physical or mental impairments that seriously limit one (1) or more functional capacities and who require multiple VR services over an extended period of time.
- Priority Group 3: Clients determined to have a non-significant disability. All other VR eligible clients.

Significance of disability and Priority Group are determined after reviewing the client's medical records, assessment reports, and determining the client's ability to complete work related tasks. These work-related tasks are categorized into 7 functional capacity areas:

- Communication
- Mobility
- Self-direction
- Work tolerance
- Interpersonal skills
- Self-care
- Work skills

The OOS shall not be based on any other factors, including:

- Any duration of residency requirement, provided the individual is present in the State;
- Type of disability;
- Age, gender, race, color or national origin;
- Source of referral;
- Type of expected employment outcome;
- The need for specific services or anticipated cost of services required by an individual; or
- The income level of an individual or an individual's family.

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*

Exceptions to Policy on OOS

Nebraska VR elects to serve individuals who require specific services or equipment to maintain employment regardless of their priority group.Priority will be given to individuals currently working but would almost certainly lose his or her current job if not provided specific services or equipment in the very near future that would enable him or her to retain that employment.

a. An IPE can be developed and the services required can be provided immediately.
b. VR services can only be provided to maintain the current employment.
c. The client is not eligible for post-employment services.
d. The case record must document communication from the employer stating the employee is at immediate risk of losing their job.
e. The client is not required to disclose the disability to the employer.
f. The client requires only specific services or equipment that will keep the client in his/her current job.

Note 1: This exemption does not apply to those losing jobs because the employer is going out of business, eliminating the job, or for other business-related decisions.

Note 2: This exemption does not apply to clients who are underemployed or seeking to maximize their employment.

Note 3: This exemption does not apply to those who are seeking to change employer.

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*

Nebraska VR has allocated the funds received under section 603 to providing supported employment (SE) services to persons with the most significant intellectual disabilities and behavioral health disabilities. The program's expenditures for SE services to this population are supplemented by section 110 funds. With the funds under 603(d) to be expended on youth with the most significant disabilities, additional 110 funds will be needed to continue the service level for persons with most significant disabilities.The funds received under Title VI, 603 will continue to be distributed in the form of contractual payments for the costs of SE services provided to eligible persons with the most significant intellectual and behavioral health disabilities.

In an effort to align state plan initiatives, the following goals and priorities are also outlined in Nebraska's draft Olmstead Plan. The goals and priorities, specific to supported employment, for PY 2020-2023 are:

Increase the number of individuals who exit VR supported employment with competitive integrated employment.

- Baseline: In PY 2019 — Total SE cases closed: 103; Total successful: 47; Percentage: 45.63% people who received VR supported employment (SE) or customized employment exited with competitive integrated employment.
- PY 2020 Target: 47.0% of people who receive VR SE or customized employment will exit with competitive integrated employment.
- PY 2021 Target: 49.0% of people who receive VR SE or customized employment will exit with competitive integrated employment.
- PY 2022 Target: 51% of people who receive VR SE or customized employment will exit with competitive integrated employment.
- PY 2023 Target: 53% of people who receive VR SE or customized employment will exit with competitive integrated employment.

Priorities:

- Increase monitoring and addressing lack of progress in supported employment cases. Increase transparency with numbers to help propel services forward. Mandatory Team Meeting if individual is not employed within 90 days.
- Continue to implement the Rapid Engagement model.
- Utilize Employ Meetings, i.e. EmployLNK, EmployOMA, EmployNP.
- Continued focus on students and youth to help change the mindset about obtaining competitive integrated employment.
- 'VR Victories' shared at beginning of any meeting where there are community partners or stakeholders so positive, real examples of competitive integrated employment can be highlighted. Use same case collection process as in place for Transition Newsletter.
- Continue to monitor data across the state to determine where there are successful outcomes so best practices can be replicated.
- Explore performance based contracting and the potential for implementing this as a way of achieving successful outcomes.
- Evaluate training needs of the supported employment service providers.
- Address the low number of supported employment providers and specialty providers, i.e., Acquired Brain Injury (ABI), across the state and ways to increase access to training in order to increase the number of those providers available to VR clients with those needs.
- Consider in-house training for VR staff to develop expertise in understanding and implementing the employment support needs of clients with ABI and Autism.

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

A work group has been developed by Nebraska VR to study current practices and establish ways to identify, develop, and/or fund extended services (including VR funding extended services for youth with the most significant disabilities). Some youth are eligible for funding for such services from Nebraska's Health and Human Services Behavioral Health and Developmental Disabilities divisions.

The work group reviewed information and determined findings from a pilot study. The study was conducted with a small group of clients whose extended support funding could not be identified at the time the SE plan was developed. Based on the pilot data and other anecdotal information, considerations are:

- Development of an alternative plan to SE and
- Creative methods to develop and identify funding for extended services to support a person to maintain their job after transition from VR services

The work group also described provision of extended services for youth with the most significant disabilities, for a period of time not to exceed 4 years, or until age 25, whichever occurs first. The transition to extended services will occur after the youth receives up to 24 months of supported employment services. Nebraska VR will fund such services when there is no other resource to provide the service through interagency agreements—including those with Nebraska Health and Human Services' Behavioral Health and Developmental Disabilities Divisions. It is recognized that youth with autism and those with brain injury who are determined to have the most significant disabilities are two populations who may be without readily-available or readily-identified funding for extended supports.

The work group's product will be guidance and training on creative ways to provide needed services as well as development of a plan for extended supports. This work group will include plans and goals to provide/fund extended supports to this population as permitted in regulation.

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.

Nebraska VR has a written agreement with the State of Nebraska's Health and Human Services Division of Behavioral Health that promotes evidence-based supported employment services to individuals with behavioral health diagnoses. Nebraska VR and the Division of Behavioral Health Services co-fund the SE milestones with Nebraska VR paying three (3) milestones and the Division of Behavioral Health funding one (1) milestone and paying for extended supports for those age 19 and over.

Nebraska VR also has a written agreement with the State of Nebraska's Health and Human Services Division of Developmental Disabilities. The Division agrees to fund extended services to youth and adults qualifying for developmental disabilities after transition from VR SE milestones funding.

With these written agreements, VR leverages public funds for both SE and extended services.

o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

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

- Continue to focus on relationship building with businesses, service providers, SRC, educators, and Workforce partners.
- Develop a multi-year training plan for new and existing staff on how to use engagement strategies throughout the VR process.
- Conduct annual case reviews completed by the Program Team and Office Directors.
- Continue to use social media strategies to increase opportunities for communication with clients, businesses, service providers, Workforce partners, and staff members.
- Identify the needs for job development and job coaches in the rural areas of Nebraska.

These strategies listed match the priorities and goals outlined in description l. Goals and Priorities.

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*

Nebraska VR will improve and maintain assistive technology services with the following strategies:

- Maintain the VR partnership with Nebraska Assistive Technology Partnership (ATP) through the delivery model to schools as summarized below:
    - The Nebraska Assistive Technology Partnership (ATP), part of Nebraska VR and the Nebraska Department of Education (NDE), receives a grant from NDE/Special Education to provide services to professionals (e.g. IEP/IFSP Team) working with children, ages birth to 21, with disabilities. These services include technical assistance and training on assistive technology (AT). Examples of technical assistance and trainings provided are: how to consider AT in the IEP/IFSP, how to conduct an AT assessment, how to acquire and provide AT tools/systems, implementing AT effectively, and evaluating the effectiveness of the AT for the student/child. ATP also promotes the use of AT through various awareness activities and maintains a statewide assistive technology loan pool that professionals can access in order to fill a temporary need for a student/child or assist in the AT decision-making process. The vision of the ATP-Education program is to ensure that individual children/students can be successful by creating systemic capacity that results in quality Assistive Technology services for every child/student who needs AT.
- Maintain the VR partnership with Nebraska ATP as summarized below:
    - The agency contracts with the Nebraska ATP to provide rehabilitation engineering and assistive technology services to agency clients at all stages of the rehabilitation process. Clients are referred to ATP by Nebraska VR staff for all assistive technology assessments, funding coordination and assistive technology solutions. ATP offices are located throughout the state and in some cities are co-located with the VR office. VR will continue to participate in the VR/ATP monthly meetings and serve as a member of the ATP Advisory Council.

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*

Nebraska VR will improve and maintain outreach procedures using the following strategies:

- Maintain a continued focus on competitive integrated employment.
- Maintain relationships with service providers, businesses, community resources, schools, SRC, and educational service units.
- Foster cultural competencies and address barriers presented by poverty.
- Prioritize hiring bilingual staff.
- Establish and maintain service agreements with qualified foreign language interpreters and utilize phone and video remote foreign language interpreting when on-site interpreting is not available. This will also include sign language interpretation services.
- Continue to translate agency audio/visual media, brochures and forms in other languages. It was suggested to consider Trans-Act as a resource.

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)*

- Maintain the state and regional Youth Leadership Councils that provide students with opportunities to develop leadership skills. Seek input on suggestions from a youth perspective on the 5 core Pre-Employment Transition Services activities.
- Develop, revise, and disseminate publications on Pre-Employment Transition Services and Transition Services for both youth and students with a disability and their families.
- Maintain existing Project SEARCH sites.
- Maintain existing Certificate Programs.
- Continue representation on the Special Education Advisory Council (SEAC) subcommittees.

- Continue to serve on the Nebraska Transition Advisory Committee and the Transition Practitioner's Committee.
- Continue to develop agreements with local LEAs for provision of Pre-Employment Transition Services.
- Continue training for VR staff related to IEP development and participation in meetings.

Nebraska VR and Nebraska Commission for the Blind and Visually Impaired (NCBVI) have jointly agreed on the minimum age of 14 for students with disabilities to begin the provision of Pre-Employment Transition Services per the NCBVI and Nebraska VR Cooperative Agreement.

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

Nebraska VR will continue to establish, develop, and improve community rehabilitation programs using the following strategies:

- Develop mutual accountability for milestones.
- Seek training partnerships.
- Develop and implement best practices with community providers.

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

- Continue to develop strategies and engage in activities in coordination with the appropriate six (6) core partner programs and participating Combined State Plan partners to establish benchmarks.

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

- Continue participation on the Nebraska Partners Council to strengthen cross agency partnerships that focus on workforce solutions.
- Continue involvement in the State and local Workforce Boards.
- Dovetail with the Nebraska Department of Labor's established career pathways initiatives through our Career Pathways Advancement Project.

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

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

The goals and priorities outlined in the State Plan are supported by the agency strategies and were informed by the Comprehensive Statewide Needs Assessment.

B. Support innovation and expansion activities; and

The State Rehabilitation Council provides input and guidance on VR's innovative approaches to service delivery including the Meet You Where You Are model, the use of motivational interviewing techniques, and the expanded use of social media. Members also provide direction on strategies to reach underserved and unserved through expanded and innovative marketing strategies.

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.

The proactive strategies listed above are expected to address identified barriers such as locating, accessing, and coordinating needed community services and supports expanding work-based training opportunities throughout the entire state. Nebraska VR remains committed to serving individuals with disabilities in their local communities. To be successful this includes establishing partnerships and collaborations with local businesses, local community resources, schools, and other programs.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. *An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:*

    A. Identify the strategies that contributed to the achievement of the goals

The following represents Nebraska VR's evaluation and report of progress on the agency's PY 2018 and 2019 Goals and Priorities.

Increase the Rehabilitation Rate (Goal of 65%)

In PY 2018 and 19, Nebraska VR:

1. Conducted quarterly reviews with the leadership team to analyze progress on Standards & Indicators including the rehabilitation rate. With the transition to the six performance accountability indicators, there has been more of an emphasis on reviewing those data and additional information presented on the RSA Dashboards including:
    - Measurable Skill Gains
    - Exit Data
    - Pre-Employment Transition Services
    - Competitive Integrated Employment Outcomes; and
    - VR Participant Data

Nebraska VR's Employment Rate in Program Year 2018 and 2019 (by Quarter) were:

- PY 2018 Q1: 56.6%
- PY 2018 Q2: 68.7%
- PY 2018 Q3: 55.6%
- PY 2018 Q4: 50.7%
- PY 2019 Q1: 50.0%

Nebraska VR's employment rate and performance on all other data indicators listed above have been dramatically impacted by the implementation of Order of Selection (OOS) and having all priority categories closed. Therefore, as Nebraska VR continues to move individuals off of the wait list, it is anticipated, the agency's performance will improve on all indicators.

1. Continued to maintain fifteen (15) Project SEARCH training programs across the state. In PY 2018, 97.8% (88/90) students successfully completed the program. This is an increase of 2.8% from PY 2017.
2. Nebraska VR has a point of contact on The National Employment Team (NET). Nebraska VR pursued developing partnerships with employers identified through The NET. At the completion of PY 2018, there were over 3,100 business contact entries in Nebraska VR's employer data base.
3. Continued outcome-based supported employment services for individuals with behavioral health, acquired brain injury, autism spectrum disorders, and intellectual disabilities.
4. Maintained Certificate Training Programs. These programs are based on local employer needs and delivered in conjunction with community colleges and high schools. The training areas include: electrical, welding, and CNA.

Increase the quality and timeliness of services

In PY 2018 and 2019, Nebraska VR:

1. Continued to evaluate statewide data related to the 60-day timeline for determining eligibility. Internal controls were added to the agency's case management system in PY 2018-19 to enhance monitoring of this timeline.
2. Continued to evaluate statewide data related to 90 day timelines for developing an Individualized Plan for Employment (IPE). Internal controls were added to the agency's case management system in PY 2018-19 to enhance monitoring of this timeline.
3. Evaluated and continued to implement the Progressive Employment Model (Rapid Engagement).

4. Refined Work in Nebraska (WIN) Meetings. These meetings allow VR staff and other community partners to share job leads and develop new business contacts.
5. Offered over a dozen internal trainings for VR staff.
6. Hosted Motivational Interviewing "refresher" for all field offices.
7. Developed a new process for collecting and displaying client satisfaction survey data.
    a. In PY 2018, 470 surveys were completed.
    b. 94% of respondents reported the job VR assisted them in obtaining met their needs.
    c. 87% responded they were "very likely" to refer a family member or a friend with a disability to Nebraska VR.
8. Observed an increase in the client wage from $12.58 in PY 2017 to $13.81 in PY 2018

Develop effective community partnerships

In PY 2018 and 2019, Nebraska VR:

1. Continued to host Work in Nebraska (WIN) meetings. These weekly meetings allow for VR staff and community partners to share local labor market information.
2. Expanded the number of Business Advisory Councils. There are currently four (4) Project SEARCH Business Advisory Councils (BAC) in Nebraska with the potential expansion of four (4) more. The goal of the BAC is to broaden the program across a variety of industries, provide individuals with disabilities access to the resources they need to be successfully employed in a wide-range of fields and serve as a platform to further educate business professionals about the benefits of employing individuals with disabilities. The measurable goal is 100% employment of Project SEARCH intern participants. Between the four (4) Nebraska BACs there are more than thirty (30) businesses involved. Nebraska VR will consider increasing the number of Project SEARCH sites available in the state and will also consider the expansion of BACs.
3. Provided training to community partners prior to implementing OOS.
4. Participated in the National Disability Employment Cohort.
5. Disseminated a survey to all school districts requesting feedback on VR's delivery of Pre-Employment Transition Services. The survey has been distributed for three (3) years.
    a. In PY 2018, surveys were completed by 264 school teachers or administrators.
    b. The state average customer satisfaction score for staff delivering services in the school was 4.37 out of 5.0.
    c. In addition to collecting overall satisfaction with VR services, additional questions on the survey are related to: whether the VR Service Specialist attends IEP meetings, areas the educators are interested in learning more about, e.g., assistive technology, and suggestions for improvement.
    d. All VR staff delivering Pre-Employment Transition Services are given a copy of his/her own survey results.
6. Continued to support the delivery of seventeen (17) Benefits Planning Trainings across the state for students and families.
7. Funded Family Employment Awareness Trainings (FEAT) provided by PTI Nebraska. The goals of FEAT are to increase expectations for competitive, integrated employment for students with disabilities, and to increase knowledge of state and federal resources to support the employment of young people with disabilities.
8. Completed a Request for Proposals to support the development and implementation of eighteen (18) Summer Programs for students with disabilities.

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

1. Nebraska VR received formal approval from RSA in December 2017 to implement an OOS. By April 2018, all three (3) priority categories were closed.
2. Significant efforts have been made to remove approximately 1500 individuals from the VR wait list since October 2018; however, due to the decreased number of cases opened and successfully closed, the agency's indicator data have been impacted.
3. Additionally, funding restrictions have impacted the agency's opportunity to support innovative projects in the same manner as previous years.
4. It is recognized community partners have been impacted by increased referrals from VR as a result of having a wait list. On-going conversations among the partners has allowed for timely information about VR services and the agency's efforts to manage the wait list.

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

1. Maintained supported employment partnerships for mental health in all six (6) regions of the state.
2. Implemented supported employment milestones and payment system for individuals with behavioral health, autism, brain injury, and intellectual disabilities.
3. Utilized Title 1 funds to supplement Title VI, Part B funds to adequately address the mental health supported employment service needs in the State of Nebraska.
4. Nebraska VR has been actively engaged in the State of Nebraska's development of the Olmstead Plan. This planning has provided a different level of opportunity for collaboration and leveraging resources to support individuals with disabilities and access to the most integrated settings.

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

1. The continued delay in the compliance date for a move to integrated employment settings for individuals with intellectual disabilities by the Center of Medicare and Medicaid Services resulted in a diminished sense of urgency for family members and providers to move individuals into competitive integrated employment instead of sheltered workshop employment.
2. Due to VR's OOS, a significantly lower number of referrals were made to providers for supported employment.

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

Benchmarks continue to be established on all indicators; however, the following is a summary of the program's performance using metrics outlined in RSA's quarterly dashboards:

PY 2018 Quarter 1:

- Measurable Skill Gain Indicator: 4.5%
- Eligible for Measurable Skill Gains: 27.3%
- Measurable Skill Gains Earned: 77
- Count of Pre-Employment Transition Services: 8,420

PY 2018 Quarter 2:

- Measurable Skill Gain Indicator: 3.3%
- Eligible for Measurable Skill Gains: 29.7%
- Measurable Skill Gains Earned: 33
- Number of students with disabilities reported: 5,456
- Number receiving Pre-ETS: 3,163
- Number of Pre-ETS Services by Type: Largest reported service — Job Exploration Counseling: 2,526

PY 2018 Quarter 3:

- Measurable Skill Gain Indicator: 2.3%
- Eligible for Measurable Skill Gains: 31.4%
- Measurable Skill Gains Earned: 15
- Number of students with disabilities reported: 5,963
- Number receiving Pre-ETS: 3,369
- Number of Pre-ETS Service by Type: Largest reported service — Job Exploration Counseling: 2,680

PY 2018 Quarter 4:

- Measurable Skill Gain Indicator: 6.7%
- Eligible for Measurable Skill Gains: 33.4%
- Measurable Skill Gains Earned: 66
- Number of students with disabilities reported: 4,107
- Number receiving Pre-ETS: 2,861
- Number of Pre-ETS Service by Type: Largest reported service — Job Exploration Counseling: 2,184

Nebraska continues to study data collected for each of the common performance measures in anticipation of setting benchmarks.

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

I & E Funding for PY 2018 was used to support the State Rehabilitation Council.

q. Quality, Scope, and Extent of Supported Employment Services

Include the following:

1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities

Quality of supported employment services

All services provided will be of high quality, as judged by prevailing professional standards and such legal standards as may apply. Persons licensed, certified, or registered in accordance with the laws of the State of Nebraska to perform the services will render these services or, if the service is not regulated by the State, by persons who are able to demonstrate they are qualified by reason of education, training, and experience to perform the services.

Scope of supported employment services

The services made available by Nebraska VR using Title VI funds are limited to those initial services resulting in stable job performance in an integrated competitive work setting. These may include, as appropriate to individual needs:

1. Intensive on-the-job skills training and other training, based on individual need, is provided by skilled job trainers, co-workers, and other qualified persons based on a systematic analysis of the work to be performed, and a systematic analysis of the employer's performance expectations and requirements. It is conducted in accordance with a written plan identifying the methods of teaching, instruction, and behavior management necessary to enable the individual to acquire skills and master the work to be performed, to regulate behavior in accordance with the employer's requirements and expectations, and achieve stable job performance. The training provides for a systematic reduction of intensive teaching, instruction, and behavior management methods to the lowest intervention level necessary to maintain stable job performance.
2. Other vocational rehabilitation services that are needed to achieve and maintain job stability include, but are not limited to —
    a. Interpreter services for individuals with hearing impairments to permit communication between the individual and the skilled job trainer.
    b. Occupational licenses and permits required by federal, state, and local law to perform an occupation.
    c. Occupational tools and equipment required by the employer but not routinely provided to new employees.
    d. Rehabilitation technology services including adaptations and modifications of the workplace.
    e. Work clothing and uniforms required by the employer but not routinely provided to new employees, and safety shoes and other articles of clothing necessary to permit safe performance on the job.
    f. Transportation from place of residence to the work site and return until the person can pay for the cost from earnings and/or work incentives.
    g. Benefits planning to ensure an understanding of work incentives and earnings reporting requirements.
    h. Customized employment services to enhance the likelihood of competitive, integrated employment for individuals with significant disabilities.
3. Follow-up services, including regular contact with the employer, the individual with a most significant disability, the individual's parents, guardian or other representative, in order to reinforce and stabilize the job placement.
4. On-going monitoring services from the time of job placement until the transition to extended services from one or more extended services providers. These services include, at a minimum, the assessment of employment stability and, based on that assessment, the coordination or provision of specific services needed to maintain employment stability.

Extent of supported employment services

1. Intensive on-the-job and other training services are provided to the person to the extent necessary to achieve stable job performance or to determine on the basis of clear and convincing evidence this cannot be achieved.

Supported employment services are provided for a maximum of 24 cumulative months, with up to an additional 48 months of extended services provided to a youth with a disability (16-24) utilizing Title VI funds unless a longer period is identified in the IPE of the person.

2. Other services are made available to the extent necessary to support the individual achieving a successful competitive integrated outcome.
3. Follow-up services are provided to the individual to the extent necessary to assure that job stability has occurred, or to determine on the basis of clear and convincing evidence that job stability cannot be achieved.
4. On-going monitoring services are provided, at a minimum, twice monthly at the work site to assess employment stability and, based on that assessment, to coordinate or provide specific services needed to maintain employment stability. If off-site monitoring is determined to be appropriate, and is included in the person's IPE, it must, at a minimum, include two meetings with the person and one contact with the employer each month. Providers of supported employment services document the number and type of monitoring visits and report this information to the VR staff.

2. The timing of transition to extended services

Nebraska VR transitions the person to extended services provided by other public agencies, nonprofit agencies or organizations, employers, natural supports, or other entities no later than 24 cumulative months after placement in supported employment (unless a longer period is established in the IPE), provided that —

- the person has made substantial progress toward their hours per week goal in the IPE,
- the individual is stabilized on the job,
- the team agrees with the decision, and
- extended services are available to youth with the most significant disabilities up to for a period of time not to exceed 4 years or until such time the youth reaches the age of 25 and no longer meets the definition of a youth with a disability, whichever occurs first.

Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

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

Nebraska Division of Rehabilitation Services

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

Nebraska Division of Rehabilitation Services

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

Lindy Foley

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

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

[14] Public Law 113-128.
[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.
[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.
[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.
[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.
[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.
[20] Applicable regulations, in part, include the citations in footnote 6.

Certification Signature

Signatory information	*Enter Signatory information in this column*
Name of Signatory	Lindy Foley
Title of Signatory	Director
Date Signed	3/23/2020

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:

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	

The State Plan must include	*Include*
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 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	
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)	No
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 102(d) of the Rehabilitation Act	

The State Plan must include	*Include*
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 theRehabilitation 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 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 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 Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving

Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	14.0%	26.0%	15.0%	27.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

Program-Specific Requirements for Vocational Rehabilitation (Blind)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA: [13] Sec. 102(b)(2)(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 Nebraska Commission for the Blind and Visually Impaired (NCBVI) is an independent consumer–controlled agency. Since it is governed by a Board of consumers, there is no State Rehabilitation Council.

2. *The designated State unit's response to the Council's input and recommendations; and*

Not applicable.

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

Not applicable.

b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

NCBVI provides services statewide and does not contract with local agencies that provide match. Therefore, there is no request for a waiver.

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

NCBVI provides services statewide and does not contract with local agencies that provide match. Therefore, there is no request for a waiver.

3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

NCBVI provides services statewide and does not contract with local agencies that provide match. Therefore, there is no request for a waiver.

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. Federal, State, and local agencies and programs;

Nebraska Commission for the Blind and Visually Impaired (NCBVI) works across the state of Nebraska to establish interagency cooperation with, and utilization of the services of all relevant entities, including those which are not within the Workforce Development System. NCBVI administrative personnel communicate and cooperate with representatives of the statewide or corporate level of such entities. Counseling and other staff of our District and area rehabilitation offices do so in their areas. There are no State Use Contracting programs in Nebraska.

In each area where we had employees, NCBVI staff identify and network with a wide range of professionals in both the public and the private sectors. Doing so serves multiple purposes. NCBVI's VR professionals become well versed in the resources and opportunities available to blind consumers across Nebraska. They are able to make NCBVI services known to those same entities, to educate them about the resource available to them from blind and visually impaired individuals in their community. In some cases, NCBVI Counselors participate with local Chambers of Commerce, Lions Clubs, Rotary Clubs, Commissions or Area Agencies on Aging, Community Networking Councils, Project Search, and related organizations.

The United States Rural Development Agency (RDA) administers programs related to self–employment, business opportunities, housing, and other community economic development activities. NCBVI collaborates by providing information to counseling staff about the RDA programs that might benefit their clients. NCBVI VR Counselors also provide information to RDA representatives about efforts to assist blind and visually impaired Nebraskans to access funds available for developing self–employment and business opportunities.

NCBVI works to assure that all the programs of the RDA in Nebraska are available to clients. We also are available to provide training about NCBVI services, and about blindness, to RDA personnel. With this training, they are able to provide reciprocal referrals to persons participating in their programs who might be eligible for services from our agency. NCBVI staff are located in six locations (in four locations staff telecommute from home); NCBVI staff work in all communities across the State of Nebraska. Agency staff members go to where the referrals and clients live, to provide the rehabilitation services specific to each individual. In each area and statewide, they work with local, state, and regional resources available. These include, but are not limited to, small business, women's and minority business initiatives, community commercial, recreational and educational programs, religious entities (churches, synagogues, mosques), and private or public organizations are available and relevant to helping blind Nebraskans achieve their employment goals.

2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

NCBVI provides assistive technology services throughout the state of Nebraska to blind and visually impaired consumers. The Commission's three technology specialists provide assessment, consultative support, and training on mainstream and access technology products. The specialists participate in trainings and research to discover technology solutions and provide consumers and businesses the ability to weigh the pros and cons of specific technologies to

support their informed choice. Furthermore, NCBVI collaborates with Assistive Technology Partnership throughout the state in field offices and is active on the ATP Advisory Council.

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

The United States Rural Development Agency (RDA) administers programs related to self-employment, business opportunities, housing, and other community economic development activities. NCBVI collaborates by providing information to counseling staff about the RDA programs that might benefit their clients. NCBVI VR Counselors also provide information to RDA representatives about efforts to assist blind and visually impaired Nebraskans to access funds available for developing self-employment and business opportunities.

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

NCBVI programs partner with non-educational agencies serving out-of-school youth. Some of those partners are: Mexican American Commission, Latino American Commission, Nebraska Ombudsman Office, Developmental Services of Nebraska, Latino Center of the Midlands, United Way, and Nebraska Foundation for Visually Impaired, among others. If they are out of school, NCBVI provides training opportunities in-house by NCBVI staff (i.e. Nebraska Center for the Blind, employment workshops, etc.).

5. State use contracting programs.

NCBVI does not have any state use contracts.

d. Coordination with Education Officials

Describe:

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

Consistent with requirements of the Workforce Investment and Opportunities Act, NCBVI coordinates with entities within the WIOA system, including teachers of the visually impaired, the Nebraska Center for the Education of Children who are Blind or Visually Impaired (NCECBVI), and education officials, to facilitate the transition of students with disabilities from school to the vocational rehabilitation service system. We have developed a number of strategies to address the seamless transition from school to work for blind students. The most formal is a Cooperative Agreement, signed and updated periodically. The current Cooperative Agreement was signed on December 4, 2019 by the NCBVI Executive Director and the Administrator at NCECBVI. The Agreement states that a person is eligible for Nebraska VR services if they have a disability that impacts their ability to prepare for, find, or keep a job. A person must also require and be able to benefit from VR services. Students age 14-21, who are involved In Special Education, or are served under a 504 Plan, may receive Pre-Employment Transition Services (Pre-ETS).

Both agencies may include students with a disability typically served by the other agency when providing group pre-employment transition services.

NCBVI has created a Pre-ETS Memorandum of Understanding (MOU) that outlines the procedures for providing Pre-ETS to students. NCBVI and the local educational agencies (LEAs), must work together to provide or arrange for the provision of Pre-ETS services for all eligible and potentially eligible blind and visually impaired students. Pre-ETS services are a defined set of five required and nine authorized services, which also includes allowable transition coordination efforts. Pre-ETS services may be provided to all blind and visually impaired students regardless of whether an application has been completed, eligibility has been determined, or an IPE developed. NCBVI may take applications on all those potentially eligible students who may be eligible for VR services. The five required Pre-ETS services may occur in group or individualized settings. As NCBVI staff build rapport with a student, Pre-ETS services will become more individualized for each consumer. Because all of the required Pre-ETS services are incorporated in statewide programming and at district level group and individual activities, NCBVI staff must document service delivery in these areas when they occur. NCBVI ensures that no individual with a disability is excluded from participation in or be denied the benefits of services, programs, or activities. Therefore, if a student with a disability requires an auxiliary aid or service to access or participate in any of the required Pre-ETS services we must pay for such costs.

Pre-ETS are tracked in our case management system, AWARE, through the use of adding all applicable transition services to an IPE when the client reaches the minimum age, the education of the client is kept up-to-date by staff and used when determining if the client meets the requirements of a Student with a Disability and thus Pre-ETS services can be provided, and monthly reports are generated to staff listing current clients who meet the age requirements to ensure all applicable clients are receiving Pre-ETS services. For students eligible for VR services, an IPE will be developed and Pre-ETS services will be explained in detail to students and parents/guardians. NCBVI staff will document services provided to eligible students by recording Actual Service Records in AWARE and authorizations may be completed for eligible students for the 5 required Pre-ETS services. NCBVI follows the same timeline for Pre-ETS clients as non-Pre-ETS clients for VR services (60 days to determine eligibility, 90 days to initiate an IPE).

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;

On October 22, 2019, the Nebraska Commission for the Blind and Visually Impaired (NCBVI) signed a memorandum of understanding with the Nebraska Department of Education-Office of Special Education outlining mutual collaboration to serve students who are blind-deaf-blind. The agreement includes 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.

NCBVI staff will provide consultation and technical assistance to Local Educational Agencies (LEAs) and students with disabilities. These services are intended to benefit students with disabilities as they transition from secondary school to post-secondary life related to an employment outcome. These services are to assist school personnel in developing a seamless system of transition for all students.

NCBVI may provide services to students of all ages, and while most of these students will be receiving special education services under an IEP or 504 plan, it is not a requirement to be eligible for NCBVI services.

NCBVI provides consultation and technical assistance to the LEAs on the additional services available by NCBVI of Pre-employment transition services (Pre-ETS) to students who are between the ages of 14-21. Services may include, but are not limited to, tours of universities and vocational training programs, employer or business site visits to learn about career opportunities, career fairs coordinated with Workforce Development partners and employers to facilitate mock interviews, resume writing, job exploration counseling, work place readiness, work-based learning, counseling on opportunities at post-secondary institutions, self-advocacy and other general services applicable to students with disabilities. These services may be provided in groups when applicable, but are most often provided on an individual basis. Pre-employment transition services (Pre-ETS) are considered an early start on career exploration for students with disabilities and are provided to students who are eligible for NCBVI services or have signed up as a potentially eligible client to NCBVI.

NCBVI counselors, when given adequate notice, will prioritize attending IEP meetings for students who are receiving NCBVI services to provide consultation and technical assistance to vision teachers and parents regarding vocational rehabilitation services, including transition and Pre-ETS.

NCBVI also provides consultations and technical assistance on assistive technology that may be of benefit to the student. NCBVI has a team of rehabilitation technology specialists who are highly trained in the area of assistive technology as it relates to vision loss and blindness.

NCBVI also has a representative who will attend NDE transition practitioners/advisory council meetings to provide consultation and technical assistance on the services the agency provides, including transition and Pre-ETS.

NCBVI will provide consultation and compliment instruction in the areas of orientation and mobility, braille, Industrial arts, home management, etc. in accordance with the IEP.

NCBVI staff informs the LEAs that our agency provides Pre-ETS services starting at the age of 14. When the youth is ready for employment, counselors will also work with the student to place them in employment settings consistent with their strengths, preferences, resources, priorities, concerns, abilities, capabilities, interest, and informed choice.

Furthermore, NCBVI also provides consultation and technical assistance to the LEAs on that our agency will assure the completion, and provide as necessary, transition services to students who plan to enter into subminimum wage

employment at a 14(c) entity and ensure that proper documentation is completing before the youth enters sub-minimum wage employment.

NCBVI has another MOU with the Nebraska Center for the Education of Children who are Blind and Visually Impaired (NCECBVI) outlining the mutual collaboration to serve students who are blind/deaf-blind. NCECBVI is the entity under the Nebraska Department of Education that provides consultation and technical assistance to the LEAs on the area of education for blind and visually impaired children. The MOU, among working in partnership, also mentioned NCBVI's providing consultation and technical assistance to NCECBVI regarding vocational rehabilitation services, including transition and Pre-ETS services. In this Agreement the following is outlined:

- NCBVI is the Vocational Rehabilitation agency for blind, visually impaired, and deaf-blind persons in Nebraska. NCBVI provides a broad range of rehabilitation and education skills and techniques to persons who are blind, visually impaired, and deaf-blind, including those with all other disabilities who are also blind or visually impaired, supporting them to be full participants in adult life both for employment and independent living.
- NCBVI may be involved with students of any age. Involvement with younger students will generally be for the provision of independent living skills training or parent training, whereas services for students age 14-21 may also include vocational and other post-school goals. An NCBVI staff member may participate in the IEP/IFSP process when invited by the student, parent, or school and when adequate notification of the meeting is given
- NCBVI provides the following consultation to NCECBVI and the LEAs: offering education and training of parents and students, serving as a technology resource, providing specific skill training, offering connection to role models, mentors and peers, offering access to transition programs, and, providing opportunities to interface with consumer groups for mentoring and advocacy skills.

The NCBVI Executive Director also comes to the annual meeting of the NCECBVI stakeholders, where administrators of special education/vision teachers, transition state wide director, parents of blind children, and more come to talk and advise NCECBVI. As a stakeholder, NCBVI explains to the rest of the vision teacher professionals the VR process and Pre-ETS services, eligibility and how we can collaborate to serve youth with blindness. Our Lincoln District staff and Center also meets with NCECBVI on quarterly basis.

Consultation services provided by NCBVI include:

- Advice on Vocational Evaluations,
- Instruction or training for the individual to minimize the limitations of the visual disability, which may include cane travel, Braille, disability information, non-visual techniques, and advice on assistive technology.

An Agreement was also signed with NCECBVI on December 4, 2019. This agreement seeks to establish a framework of consistent outreach on both sides to assist one another and ultimately blind and visually impaired students and their families who have access to NCBVI and NCECBVI services, and seeks to strengthen the collaborative efforts between our two organizations to move toward a more seamless exchange of information to the potentially eligible students we both serve.

Potentially eligible students with disabilities in Nebraska would fall between the age range of 14 up through the end of their 21 year, which aligns with the transition services age range in Nebraska under Rule 51 and IDEA. Nebraska VR General and NCBVI have signed an agreement stating that Pre-ETS services will be for students ages 14-21.These students can either be eligible for or receiving special education services or considered disabled under a 504 plan.

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

The Nebraska Commission for the Blind and Visually Impaired (NCBVI) and the Nebraska Department of Education-Office of Special Education (DOE) has renewed a Memorandum of Understanding (MOU) in December 2019. Included in the MOU are provisions for consultations and technical assistance, transition planning, coordinating the IEP and the IPE for roles and responsibilities amongst key individuals, financial responsibilities, and procedures for outreach. The purpose is to coordinate and promote the cooperation of the programs and services available to students who are blind (including additional disabilities), deaf–blind and visually impaired during the transition process.

The DOE and NCBVI will work together to implement services at the local level through communication and collaboration with the Local Educational Agencies (LEAs) across the state of Nebraska. This relationship will include

collaborating with other departments, divisions, and agencies as needed to ensure the needs of students with disabilities are met and to remove barriers that may interfere with their success in education and eventual independent living.

LEAs and NCBVI will maintain communication regarding services that are being provided to minimize duplication of services. Coordination of these services should lead to maximizing the services that each agency can provide. Discussions will occur to identify and address gaps in services.

NCBVI and LEAs are both responsible for the development and completion of the transition component of a student's Individualized Education Plan (IEP) in concert with the student, the parents, and the IEP team. NCBVI and LEAs should ensure IEP employment goals are consistent with the goal on the Individualized Plan for Employment (IPE), where appropriate. Pre-employment transition services are provided to students in the 14-21 age range. IEP teams and NCBVI counselors will consider four factors to determine when employment preparation should start and the intensity of the services that should be provided:

1. Student knowledge and skills;
2. Student learning characteristics, including student response to ease of accessibility and accommodations;
3. Complexity of support needs, and;
4. Number of environments effected.

The more intense the need for services, the earlier preparation should start and the more people who have specialized knowledge (e.g. work experience counselors, NCBVI counselors) should be involved. In some instances, it may be in the student's best interest to start preparing for the student's transition to independence prior to the age of 14, such as in the instances of teaching the student to use assistive technology to independently complete tasks rather than only accommodating with a reader and scribe for tasks.

The LEA and NCBVI must collaborate to ensure the provision of the following pre-employment transition services to students:

1. Job exploration counseling;
2. Work-based learning experiences;
3. Counseling on opportunities for enrollment in comprehensive transition or post- secondary educational programs at institutions of higher education;
4. Workplace readiness training to develop social and independent living skills; and,
5. Instruction in self-advocacy, which may include peer mentoring.

<u>NCBVI Responsibilities</u>

NCBVI will have staff who will provide consultation and technical assistance to Local Educational Agencies (LEAs) and students with disabilities. These services are intended to benefit students with disabilities as they transition from secondary school to post-secondary life related to an employment outcome. These services are to assist school personnel in developing a seamless system of transition for all students.

NCBVI may provide services to students of all ages, and while most of these students will be receiving special education services under an IEP or 504 plan, it is not a requirement to be eligible for NCBVI services.

NCBVI offers additional services of Pre-employment transition services to students who are between the ages of 14-21. Services may include, but are not limited to, tours of universities and vocational training programs, employer or business site visits to learn about career opportunities, career fairs coordinated with Workforce Development partners and employers to facilitate mock interviews, resume writing, job exploration counseling, work place readiness, work-based learning, counseling on opportunities at post-secondary institutions, self-advocacy and other general services applicable to students with disabilities. These services may be provided in groups when applicable, but are most often provided on an individual basis. Pre-employment transition services (Pre-ETS) are considered an early start on career exploration for students with disabilities and are provided to students who are eligible for NCBVI services or have signed up as a potentially eligible client to NCBVI.

NCBVI offers services statewide; counselors are available to every school in the state. Counselors will maintain cooperative working relationship with LEAs. Counselors may develop and implement additional training programs and employment initiatives when needs are identified and agreed upon.

NCBVI counselors, when given adequate notice, will prioritize attending IEP meetings for students who are receiving NCBVI services.

NCBVI provides consultations on assistive technology that may be of benefit to the student.

A NCBVI representative will attend NDE transition practitioners/advisory council meetings.

NCBVI counselors will inform LEAs when clients are receiving NCBVI services who are also enrolled in their school district.

NCBVI counselors will compliment instruction in the areas of orientation and mobility, braille, etc. in accordance with the IEP. If additional services are being provided to the student that may impact their schooling and are not listed in the IEP, it will be communicated to the designated school contact.

NCBVI staff will provide Pre-ETS starting at the age of 14. When the youth is ready for employment, counselors will also work with the student to place them in employment settings consistent with their strengths, preferences, resources, priorities, concerns, abilities, capabilities, interest, and informed choice.

NCBVI will assure the completion, and provide as necessary, transition services to students who plan to enter into subminimum wage employment at a 14(c) entity and ensure that proper documentation is completing before the youth enters sub-minimum wage employment.

Department of Education/LEA Responsibilities

The LEA will facilitate referrals to parents/guardians of potential students of the services that NCBVI can offer and assist with referrals as requested. The LEA will ensure informed written consent for release of information is obtained prior to sharing information with NCBVI. Guardians of students who are receiving services from a Teacher of the Visually Impaired, Orientation and Mobility Specialist, or Certified Braille Instructor will receive information about the services NCBVI can provide and will facilitate referrals as appropriate.

The LEA will invite the NCBVI counselor to IEP meetings for all students with visual impairments including blindness and deaf-blindness, after parental consent is obtained by the LEA specific to outside agencies. Educators will request consultation and technical assistance services from NCBVI when needed in order to plan for individual transition needs.

The LEA will arrange for the provision of services in orientation and mobility and braille by certified providers as identified by the IEP. Educators will share results of the assessments and training plans with the family and NCBVI counselor upon obtainment of release of information.

The LEA will identify locations in the school buildings for the NCBVI counselor to meet with students (and staff, as appropriate) during scheduled visits.

The DOE will advise that the LEA will not enter into an agreement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating program under which a youth with a disability is engaged in work at a sub-minimum wage. The LEA will refer any student with a visual impairment related disability known to be seeking sub-minimum wage employment to NCBVI and provide documentation regarding the provision of Pre-ETS for those seeking sub-minimum wage employment.

Financial Responsibilities

LEA will pay for all services listed on the IEP, unless another agency or entity agrees to provide such services. Assistive Technology needs are determined by the IEP team, and provided by the LEA. In some instances, NCBVI may use funding available to provide assistive technology if the client would benefit having the item in situations that are limited by the school or to keep it post-secondary. All consultation and technical assistance services NCBVI provides to the LEA are done at no cost.

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

NDE is responsible for assuring that a free, appropriate public education, in accordance with federal and state laws, rules and regulations, to children with disabilities from date of diagnosis to age 21 or graduation. Local school districts and Educational Service Units operate under the structure of NDE and are responsible to fund the education of children with disabilities who are in that particular district. This may include direct provision of educational services in the district itself or at NCECBVI. Ongoing communication amongst NCBVI, educators, parents, and students, are an important strength to the overall transition efforts in Nebraska. NCBVI counselors and administrators will continue a

process of informing educators and service providers about the services NCBVI has available to children who are blind. Students of NCECBVI and those attending school in their local school districts also have the opportunity to participate in specialized NCBVI programs for children and youth. We invite educators to also attend and observe our programs for students. NCBVI youth programs are offered each year. In all NCBVI Transition Programs our participants are exposed to successful adult blind role models. The impact of the events is clear in terms of self–confidence, blindness skills, and elevated expectations. We can see qualitatively that many if not most adults who have attended such programs in previous years, are active, competent members of the workforce and their communities. NCBVI recently acquired a data management system which will enable us to track results quantitatively as well. Project Independence (PI) is a five day summer program for transition clients seven-twelve years old. PI provides counseling on attitudes about blindness, self–esteem building, recreational and social experiences. It enables students to develop and to utilize relevant skills in conjunction with the discussions and activities. The opportunity to be with other blind and visually impaired children is a vital factor to the success of the program participants. In addition to monthly conference calls and consumer conventions, Mentoring for Excellence retreats are offered at least twice per school year, from Thursday evening through Saturday noon. Pre-ETS and other transition aged students from across the state participate in the opportunity for base work learning, advocacy skills, and fellowship with blind and visually impaired peers and adult role models. The curriculum focuses on the five Pre-ETS required areas mandated by WIOA and personal achievement. Through workshops, videos, role-play activities and group discussion, young people explore a variety of topics relative to their everyday lives and to their career aspirations. Participants have the opportunity to learn from and with each other about how to be competent and successful in all aspects of their lives. WAGES (Work and Gain Experience in the Summer) is a summer employment program for students sixteen up to they approach high school graduation. WAGES provides students with an average of 30 hours per week work experience, social skills, advocacy skills, peer interaction, and the opportunity to enhance pre–employment and independent living skills. Participants are trained in job–readiness skills, perform actual jobs with businesses in the community, and practice the behaviors needed to maintain employment. WAGES also enhances entities within the workforce system, particularly those participating employers who learn the value of employees who are blind or visually impaired. Fifteen percent (15%) of VR funds are committed to the provision of pre–employment transition services to blind and visually impaired students in transition between 14 and up to, but not including 22 years of age. NCBVI District Supervisors and the Transition Service Specialist works to strengthen the partnership with educational institutions statewide with the objective of making a smooth transition from school to adult life and the world of work possible for more blind and visually impaired students and youth. NCBVI staff members work with local Workforce Investment Boards and Youth Councils to inform them of the program and to develop the job opportunities for the young blind participants.

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

The District supervisors, transition service specialist, and field counselors continue to work on a statewide basis to enhance communication between NCBVI, educators at all levels, and families with children identified as having a visual disability. These efforts include meetings with local Educational Service Units and school districts, together with the NCBVI technology specialists, and local VR staff to further reach out and identify students with visual disabilities who need transition services. In addition, NCBVI has an MOU with NCECBVI in which all the vision teachers in Nebraska will get information from our agency regarding Pre-ETS; including referral procedures. NCBVI's MOU with the Department of Education-Office of Special Education states that the LEA will facilitate referrals to parents/guardians of potential students of the services that NCBVI can offer and assist with referrals as requested. They will also ensure informed written consent for release of information is obtained prior to sharing information with NCBVI.

An Agreement was signed by NE-VR and NCBVI on December 18, 2019 stating that the age to provide Pre-ETS to students with disabilities is age 14 up to 22.

NCBVI uses a Fiscal Forecast to come up with the estimate of potentially eligible students for Pre-ETS. The Nebraska Center for the Education of Children who are Blind and Visually Impaired (NCECBVI) has the official number of blind and visually impaired students in Nebraska. This child count report is reviewed by NCBVI to find out the projected number of students for the subsequent school year. That new number will be multiplied with the average cost per student to determine the projected expenditures for the five authorized activities. The Deputy Director of Finance then reviews the time charging to Pre-ETS and make a projection to the end of the FFY. That number will be added to the required spending, leaving the remainder available for authorized activities and coordination services under Pre-ETS. The Executive Director and Deputy Director of Finance review all the budget information to make a final determination on the NCBVI spending allocation for Pre-ETS.

e. Cooperative Agreements with Private Nonprofit Organizations

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Most private non–profit vocational rehabilitation service providers in Nebraska do not specifically serve persons who are blind or visually impaired; however, NCBVI works cooperatively with community rehabilitation programs when the needs and interests of mutual clients dictate. These non–profit organizations are: Region V, Region 1 Office of Human Development – Scottsbluff, Outlook Nebraska, Developmental Services of Nebraska – Kearney, Goodwill Industries, South Central Behavioral Services – Cozad, Project Search, Mid-Nebraska Individual Services, Children's Hospital and Medical Center-Westside Community Schools, Columbus Community Hospital, and Madonna Rehab Hospital. NCBVI also partners with the Nebraska Foundation for Visually Impaired Children in the provision of assistive technology for blind and visually impaired children under 14 years of age on an ongoing basis.

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

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

Nebraska Commission for the Blind and Visually Impaired (NCBVI) enters into cooperative agreements with other state agencies and providers of supported employment when specific clients are identified as candidates for those services. The agreements are based on a model utilized for the purpose of providing supported employment, including the assurance of long term services. NCBVI's Deputy Director of Services has lead responsibility for Supported Employment. She is the point of contact for the Nebraska Department of Health and Human Services-Division of Developmental Disabilities (NDHHS–DDD). NCBVI Field Supervisors and Vocational Rehabilitation Counselors typically identify providers of supported employment services and make the necessary contractual arrangements. Each blind and visually impaired individual with a developmental disability has a case service coordinator employed by the NDHHS–DDD. The case service coordinator is responsible for leading a multi–disciplinary team in the development of an Individualized Service Plan (ISP) for mutual clients served by NCBVI and NDHHS–DDD. When supported employment services are involved, NCBVI provides incentive payments at specific intervals (start of job search, start of employment, stabilization, maintenance, and start of long-term support.). This arrangement is in accordance with the "milestones" model used by Nebraska VR. Supported employment services begin after job placement and are to maintain and support an individual with the most significant disabilities in employment. Job placement services are VR services (34 C.F.R. 361.48(b)).

NCBVI has an MOU with the NDHHS-DDD to share information and to serve clients mutually. NCBVI is currently contracting for supported employment services on behalf of blind persons provided by the Autism Center of Nebraska. NCBVI collaborated with the Department of Education, Special Education and Vocational Rehabilitation (Nebraska VR Services) in the development of policies and procedures more clearly delineating the responsibilities of the different agencies and institutions involved and the scope and nature of services available to younger persons with disabilities in transition from school. The Collaborative Agreement between NCBVI, Department of Education – Office of Special Education, and the Nebraska Center for the Education of Children who are Blind or Visually Impaired, applies to persons who are likely to require supported employment or extended services in the future, as well as those students without this need. NCBVI has MOUs with VR general, Assistive Technology Partnership, several public schools and employers to serve students under Project Search. These MOUs are renewed every year.

g. Coordination with Employers

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR Services; and

The business community is a key customer for vocational rehabilitation. NCBVI professionals across the State have active approaches to reaching out to employers in their areas of coverage. NCBVI counselors and supervisors are engaged with the American Job Centers (AJC) and the WIOA state and local boards. In addition, VR counselors and supervisors are members of employer groups, or business networking organizations, as available in each area. These include local Chambers of Commerce, leadership organizations on several cities, and other entities established for businesses to connect in a meaningful way.

Employers and Human Resource personnel of companies are invited to tour the Nebraska Center for the Blind. This gives them a chance to learn about the potential capability of blind persons as potential employees and to dispel misconceptions held by many people about blindness, and thus be open to give blind people internships or OJTs opportunities. Furthermore, VR professionals, including counselors and technology specialists in particular are available to spend time at companies to assess the positions or openings, to identify if any accommodations may be needed and to provide information about the various technologies and adaptations that can facilitate employing blind and visually impaired persons in most every occupation. Our field staff also bring our consumers to employment conferences and job fairs. Information is also provided about the resources available – some directly from NCBVI, such as paying for technology, or from external sources, such as tax supports or benefits to the employer as a result of hiring a person with a disability.

NCBVI has developed partnerships with a number of employers where our clients get career exploration and/or on the Job Training Opportunities (OJT). NCBVI liability insurance covers the client so the employers do not have to be concerned about it when providing career exploration or OJT opportunities.

Below are the types of career exploration opportunities (e.g. internships, OJT's, and work adjustment training) that have been developed with employers to facilitate the provision of VR services: Strictly Business (Graphic Artist), Leadership Lincoln (Clerical), Antonio's Taste of Lincoln (Food Service Vending), Lincoln City Libraries (Custodial), Holiday Inn Southwest Hotel (Housekeeping), Lincoln Humane Society (Animal Care Staff), University of Nebraska-Lincoln (Food Service Worker and Daycare Worker), Pizza Hut (Custodial), Butler County Health Care Center (Laundry Worker), Taco Johns (Busser), Ambassador Care Center (Laundry Worker), Nebraska Games and Parks (Groundskeeper), Canine Design (Bathing Assistant), Anytime Fitness (Custodial), Valentino's Pizza (Busser), Lincoln Public Schools (Busser), Lancaster County Records & Information Management (Document Shredder), Lincoln Children's Museum (Daycare Assistant), State Capitol (Tour Guide), University Daycare (Childcare Provider), YMCA (Custodial), Latino American Commission (Clerical Worker), State Ombudsman Office (Clerical Worker), Embassy Suites Hotel (Custodial, Dishwasher, and Maintenance), Cornhusker Marriott Hotel (Housekeeping, Food Service, Banquet Set Up, and Maintenance), St. Elizabeth's Hospital (Groundskeeper), Columbus Hospital (Housekeeping), York General Hospital (Clerical, Food Service, Environmental Services), Big Mama restaurant (Cook), Michael's Craft Store (Stocking, Shipping& Receiving), Genesis Gym (Gym Attendant), Canine Design (Kennel Assistant), Goodwill (Crew Member, Retail Stocker), Bakers (Courtesy Clerk), Hy-Vee (Courtesy Clerk), Henry Doorly Zoo (Ambassador in Education Department), Zoo Restaurant (Food Prep and Serving), Carroll Center, Boston, Ma (Social Worker Intern), Douglas County Hospital (Social Worker Intern), Boystown National Hospital Camp Abilities (Camp Counselor), Outlook Nebraska (Admin Assistant for Enrichment Program), Old Navy (Shipping & Receiving Clerk), Radio Talking Book (Volunteer Coordinator), TLC (Pet Sitting and Dog Walker), Bennett Martin Library (Library Aide), No More Empty Pots (Food Service/Chef), YMCA (Life Guard and Instructor), Pitch Pizza (Food Prep), Lincoln Public Schools (Assistant to Choir Director), Calvert Recreation Center, Lincoln (Camp Leader), and AME Computer Repair (Computer Technician).

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

Transition services, including Pre-Employment Transition services (Pre-ETS) for students and youth with disabilities are key to life-long successful employment of persons with disabilities. NCBVI has a strong emphasis on building the skills and abilities of blind and visually impaired youth and blind students, so that they will be successful. The Work And Gain Experience in the Summer (WAGES) program is an example already in place. WAGES first focuses on identifying employers who will hire young clients for a nearly full–time job during the summer. Employers involved are encouraged to consider the youth as any employee, with high expectations for performance. NCBVI provides wages to the clients and consultation and technology to the employers. This and other such programs are effective in the career success of the young clients; they are also instrumental in enabling employers to have direct experience with the benefits of hiring people who are blind. This promotes more opportunities for VR clients of all ages to achieve full–time integrated employment. Mentoring for Excellence is a program for Pre-ETS students and transition clients where they get services on the five areas required by WIOA; NCBVI contract this program with the National Federation of the Blind. We are also working on partnering with NCECBVI and ATP to provide equipment and training to Vision Teachers and blind students on science, technology, engineering, and math (STEM) so blind students can be better prepare for a career in the future.

An Agreement was signed by NE-VR and NCBVI on December 18, 2019 stating that the age to provide Pre-ETS to students with disabilities is age 14 up to 22.

h. Interagency Cooperation

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. The State Medicaid plan under title XIX of the Social Security Act;

The Nebraska Commission for the Blind and Visually Impaired (NCBVI) has an Interagency Agreement with the Nebraska Department of Health and Human Services, Division of Developmental Disabilities in which cooperation and collaboration regarding the State Medicaid plan under title XIX of the Social Security Act is addressed.

The purpose of the Agreement is to establish the terms and conditions of the relationship between the parties regarding the exchange of information related to DHHS Medicaid beneficiaries referred to or currently receiving services from NCBVI. According to this interagency agreement:

DHHS Developmental Disabilities (DD) shall:

1. Refer to NCBVI eligible Medicaid beneficiaries who have a visual impairment along with other disabilities and who desire to seek competitive integrated employment, including those beneficiaries receiving Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI). Such referral shall include any case information related to the current Individual Support Plan (ISP) needed to determine eligibility under this agreement; and,
2. Provide information on the status of applications for developmental disabilities services and eligibility of students exiting education programs so that DHHS/DD and NCBVI can coordinate efforts to provide uninterrupted services to such students.

NCBVI shall:

1. Communicate with DHHS/DD on matters related to Supported Employment Provider implementation of sub minimum wage requirements consistent with and in compliance with the Workforce Innovation and Opportunity Act,
2. Work with DHHS/DD to determine the status of referrals and applications for VR clients and students receiving Pre-Employment Transition Services,
3. Provide written documentation when an individual is determined unable to benefit from VR services in terms of an employment outcome because of the severity of their disability,
4. Provide to DHHS/DD the names of beneficiaries as they are removed from the VR wait list,
5. Provide detailed, written documentation of VR clients' specific long-term support needs when closure occurs and milestones ends,
6. Provide periodic reports of services authorized, based on mutually agreed upon content; and
7. Comply with the HIPAA Business Associate Agreement.

DHHS/DD and NCBVI shall:

1. Share information and data as mutually agreed upon in order to most effectively and efficiently serve those clients to whom each agency provides services.

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

NCBVI collaborates with the Nebraska Department of Health and Human Services–Division of Developmental Disabilities services (NDHHS–DDD) to identify potential clients, coordinate service plans and share funding for those individuals in the System who are described as blind and visually impaired.

3. The State agency responsible for providing mental health services.

Representatives of NCBVI and the Department of Health and Human Services-Division of Behavioral Health (NDHHS-DBH) are in contact to discuss how our two agencies can work together to provide VR services and to promote competitive integrated employment opportunities on behalf of blind and visually impaired people with behavioral health conditions. Services include A method for providing supported employment services similar to the milestone approach used by Nebraska VR General. Other mental health services are provided statewide by various entities. NCBVI personnel in each area cooperate with those providers to ensure that mutual clients, or persons who may need both VR and mental health services, will be adequately and appropriately served.

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. System on Personnel and Personnel Development

A. Qualified Personnel Needs

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

NCBVI staffing complement totals thirty-eight and a half (38.5) FTEs; thirty-seven (37) full-time staff persons and three (3) part-time staff. NCBVI personnel include ten (10) vocational rehabilitation (VR) counselors; three (3) District supervisors and one (1) Center supervisor; eleven (11) rehabilitation teachers (orientation counselors); four (4) program specialists (two (2) in technology, one (1) in transition services; one (1) in Nebraska Business Enterprises);. There are also eight (8) administrative/business personnel including one (1) executive director, two (2) deputy directors, one (1) for services and programs and one (1) for finance; three (3) Administrative Assistants, one (1) for data management, one (1) for NBE and one (1) is the Executive Director's assistant; one (1) Accountant I; and one and one-half (1.5) Accounting Clerks and half (.5) Case Aide. The Nebraska Business Enterprises (NBE) program consists of a team including one (1) Program Specialist, one (1) NBE Administrative Assistant, and part of the time of the VR Deputy Director. All NCBVI Vocational Rehabilitation Counselors meet the state standard by having achieved the status of Certified Vocational Rehabilitation Counselor for the Blind (CVRCB). Eleven (11) staff members hold graduate degrees of a Masters or higher, including one J.D. These positions are all included in the total agency staffing, mentioned above.

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

We project the total number of persons receiving vocational rehabilitation services (all statuses, from applicant through full services) during FY 2021 to total 500. The ratio of applicants and eligible individuals served to Vocational Rehabilitation Counselors will be 50 to 1. The current staffing level enable NCBVI to provide core services to customers. Generally, the number of individuals served each year does not change a great deal.

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.

When numbers of referrals increase, we work to find ways to effectively streamline our processes to enable us to continue meeting customer needs. Budgetary considerations and state regulations which limit personnel per agency prevent us from changing our staffing to any great extent. However, we monitor services to assure that all core services are provided and that all active Individualized Plans for Employment are carried out in full. Policy and procedures were in place as we implemented Order of Selection in March 2019. However, we were able to get more state funds and therefore balanced our budget, and; currently, there are no clients on the wait list and we will be out of Order of Selection by March 2020. As stated, to date we are able to manage the number of personnel who will be needed by the Commission to provide vocational rehabilitation services to all eligible individuals. During the next five years, we project that the number of individuals served including those with significant disabilities, will neither increase nor decrease significantly from the current level. Over the past year, due to the lack of funds, we had to lay off twelve (12) staff, from which four (4) were part time. No VR counselors were laid off. one (1) technology specialist and one (1) Program specialist retired, and; one (1) Orientation Counselor (Braille instructor at the Training Center) and one (VR counselor retired. NCBVI was able to acquire additional funds from the Nebraska Unicameral and therefore we were able to rehire some Orientation Counselors for the Training Center and the field; and a Program Specialist for NBE. Other vacancies projected during the next five years, based on potential retirement age and age of the individual, include: three (3) Orientation Counselors (one shop instructor and one orientation and mobility instructor, both at the Training Center and one orientation counselor for the field), two (2) Vocational Rehabilitation Counselor, one (1) District Supervisor, one (1) part time Vocational Rehabilitation Technician (Apartment Resources at the Training

Center), one (1) Administrative Assistant I for NBE, and one (1) part time case aide. The plan is to consider the needs of the agency as people retire. When any vacancy occurs, we assess client needs statewide, to determine whether to change the staffing patterns. We may decide to move any vacant position to a different location in the State or to put the resources toward a different position.

Table 55. Projections of the number of personnel

Row	Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
1	Vocational Rehabilitation Counselors	10	1	2
2	Vocational Rehabilitation Technicians	0.5	0	0.5
3	Orientation Counselors (Rehab Teachers)	11	4	3
4	Program Specialists (Technology, Transition, OIB, NBE)	4	1	0
5	Vocational Rehabilitation Supervisors	4	0	1
6	Deputy Directors	2	0	0
7	Business, Personnel, Other	6	1	1.5
8	Executive Director	1	0	0

B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

There are no institutions of higher education in Nebraska that are preparing vocational rehabilitation professionals. The State law mandating standards for Certified Vocational Rehabilitation Counselor for the Blind (CVRCB) enables NCBVI to hire, train and maintain qualified staff. This is especially important because there are no post-secondary degree programs in Rehabilitation Counseling within Nebraska. It is extremely rare that our job candidates have a CRC, and rarely do applicants have a Master's or Bachelor's Degree in Rehabilitation Counseling specifically. There are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act, to prepare vocational rehabilitation professionals in the disciplines designated in the Act [29 USC 771(b)(1)(B)].

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

- Institutions - 0
- Students enrolled - 0
- Employees sponsored by agency and/or RSA - 0
- Graduates sponsored by agency and/or RSA Graduates from the previous year - 0

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.

As stated above, there are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act, to prepare vocational rehabilitation professionals in the disciplines designated in the Act [29 USC 771(b)(1)(B)]. Nor are there any colleges or universities offering academic programs in vocational rehabilitation at the Baccalaureate or Graduate degree levels. Therefore, there is no coordination or facilitation of recruitment, preparation or retention efforts between NCBVI and colleges or universities within Nebraska.

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Currently, there is vacancy for a Vocational Rehabilitation Counselor, one vacancy for a Program Specialist (NBE coordinator), four (4) vacancies for Orientation Counselors (adaptive technology teachers and orientation counselors; and one vacancy for an Accounting Clerk II for the Business Office. When vacancies occur within our VR positions, NCBVI recruits through local and statewide newspapers, State of Nebraska Personnel services, consumer organizations of blind persons, University graduate programs beyond our immediate geographic area, and related list-serves. As a result, about 30% of NCBVI's staff is blind. As stated above, there are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act, to prepare vocational rehabilitation professionals in the disciplines designated in the Act [29 USC 771(b)(1)(B)]. Nor are there any colleges or universities offering academic programs in vocational rehabilitation at the Baccalaureate or Graduate degree levels. Therefore, there is no coordination or facilitation of recruitment, preparation or retention efforts between the Commission and colleges or universities within Nebraska. There are, however, some such graduate programs in the Midwest. NCBVI has contacted the university placement offices of nine institutions. All have indicated that they will post any job openings that we transmit to them. During 2014, we began to do this on a routine basis. The goal is to recruit recent graduates to apply for open positions with NCBVI in the future. Non–Discriminatory Plan NCBVI always strives to be non–discriminatory in hiring, retention, and promotion of staff from minority backgrounds and with disabilities. To recruit qualified personnel including those from minority backgrounds and those with disabilities, NCBVI follows federal Affirmative Action guidelines. We recruit via national consumer groups of blind individuals. To prepare and retain all personnel, including those from minority backgrounds and those with disabilities, the initial preparation and the ongoing training plan are individualized according to each person's specific education needs and also encompasses training issues that will maximize the agency's effectiveness and efficiency.

3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

Nebraska statute requires a State Certification for Vocational Rehabilitation Counselors for the Blind. This law is the highest standard in Nebraska for the discipline of rehabilitation counseling for the blind. All NCBVI Vocational Rehabilitation Counselors meet the state standard by having achieved the status of Certified Vocational Rehabilitation Counselor for the Blind. Eleven staff members also hold degrees of a Masters or higher. Certified Vocational Rehabilitation Counselor for the Blind (CVRCB) is defined as a person who is certified to practice vocational rehabilitation counseling for blind persons and holds a certificate issued by NCBVI. Vocational rehabilitation counseling for the blind is defined as the process implemented by a person who operates a comprehensive and coordinated program designed to assist blind persons to gain or maintain remunerative employment, to enlarge economic opportunities for blind persons, to increase the available occupational range and diversity for blind persons, and to stimulate other efforts that aid blind persons in becoming self–supporting. The qualifications to be a certified vocational rehabilitation counselor for the blind in Nebraska are: (a) to have a bachelor's degree from an appropriate educational program approved by the NCBVI Executive Director; (b) to have completed six hundred (600) hours of immersion training under sleep shades (for persons with any functional vision) at the Nebraska Center for the Blind (operated by NCBVI); and (c) to have completed appropriate continued education training credits as approved by the NCBVI Executive Director. The plan for training newly hired personnel who do not meet the established standards is as follows: New hires for VR Counselor positions must have the bachelor's degree (a) before hire. Training in the immersion setting (b), begins on the first day of the second week of employment. It continues for 600 hours of their employment, that is roughly four (4) months of work time. The time period allowed is sometimes extended if there are interruptions to the training, such as leave needed for illness, vacation, or sometimes meetings that must be attended, etc. The continuing education credits (c) are accrued over time and are reviewed every three years to qualify for certification renewal. Intensive systematic immersion training of six hundred (600) hours is provided by NCBVI Nebraska Training Center for all newly hired counselors, followed by three months of training in the field specific to the individual's new position. This training provides an orientation to the agency understanding of all aspects of blindness and the strategy of service delivery that grows out of that knowledge. The training includes reading and discussion of many articles and documents in the blindness field, and skills training in non–visual techniques and technologies through hands–on experiences. To a lesser degree, paraprofessional or support personnel also receive intensive pre–service training in the office where they will be working at the start of their employment. In addition, we have three staff with certification on Orientation and Mobility and one on Unified English Braille.

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.

Following Center Training, newly hired rehabilitation personnel continue with two to three months of on–the–job training activities for specific job duties including agency policies and procedures, accessing local resources, sensitivity training, social security, vocational counseling techniques, consumer group information, etc. The topics covered include a wide range of policies and procedures, counseling techniques, teaching modalities, etc. Each Certified Vocational Rehabilitation Counselor for the Blind shall, in the period since his or her certificate was issued or last renewed, complete continuing competency requirements as set forth by NCBVI under the Executive Director's approval. Annually, each employee and supervisor review performance and plan for individualized training. The goals include activities to enhance abilities in blindness skills, to refresh and deepen understanding of philosophical concepts, to expand professional knowledge within the field of rehabilitation counseling for the blind, and opportunities for training specific to rehabilitation counseling for specific positions. Discussions of appropriate training and services are held in local offices and by the Administrative Team in Central office. Employees are also encouraged to spend time with other staff to learn new practices and to stimulate ongoing improvement.

4. Staff Development

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

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

Supervisors have provided data regarding their staff's education, including degrees held. As mentioned above, the CVRCB Certification requirement is a Bachelor's degree approved by the Executive Director, and 600 hours of intensive training at the NCBVI Nebraska Center for the Blind. We encourage VR Counselors to pursue additional academic work. NCBVI has two offices (Lincoln and Omaha), and 9 staff without a physical office but working with clients in the North Platte district and Norfolk. Some of these locales are many hours away from colleges or universities with graduate programs relevant to this endeavor. Distance learning is an option for some parts of a degree program, but may not fulfill all requirements for such a program. Many activities are conducted in the team setting. This enables mentoring of staff less experienced by those with more expertise in a particular area. Individual staff members may also schedule time with others to expand their own knowledge, skills and experience in areas needing to be strengthened. When we have enough funds, we bring trainers on placement, Pre-ETS, Customized Employment; send staff to the National Rehabilitation Leadership Institute and other training opportunities around the country. These skills help counselors build more positive working relationships with clients towards the achievement of individualized service goals and objectives. NCBVI coordinates efforts with institutions of higher education, organized consumer groups and professional associations to recruit, prepare, and retain qualified personnel, including personnel from minority backgrounds, and personnel who are individuals with disabilities. Continuing efforts ensure that all personnel are adequately trained and prepared to meet standards that are based on the highest requirements in the State and to become certified in accordance with State Law. NCBVI also works to ensure the availability of personnel internally (or from external resources) who are, to the maximum extent feasible, trained to communicate in the native language or mode of communication of an applicant or eligible individual. Ongoing staff development activities will ensure that all NCBVI personnel receive appropriate and adequate training. Funds from several segments of the NCBVI budget are committed to developing personnel, including funding training from the Nebraska Center for the Blind, as well as tuition and related expenses for expanding the capacities of NCBVI staff. Ongoing training is made available to all staff on relevant and timely topics. Retaining qualified personnel is important because of the investment we make with the intensive Center Training as well as our willingness to reimburse tuition for course work. Topics of focused training sessions may include, but are not limited to:

- Laws and regulations, including the Rehabilitation Act, Randolph–Sheppard, the Workforce Innovation and Opportunity Act, Americans with Disabilities Act, Individuals with Disabilities Education Act, and others,
- methods to help clients of all ages achieve successful employment in high–quality positions with benefits and opportunities for advancement,

- using data to measure the success of concentrated efforts for achieving goals of high quality employment outcomes,
- providing effective services to transition–aged persons who are blind or visually impaired, including approaches to outreach and service delivery;
- ways to work effectively with the increasing number of older individuals who are losing vision but still want or need to be a part of the workforce,
- serving persons with multiple disabilities, especially deaf–blindness,
- assistive technology, including non–visual and low vision options,
- maximizing effectiveness in the group training or counseling setting,
- Social Security information, including benefits counseling and PASS plan development, supported employment, workplace policies, positive philosophical understandings of blindness, diversity awareness and sensitivity training, especially to working with people from poverty, and
- additional relevant issues, e.g. transportation, crisis management, etc.

The long–range plan for ongoing development of staff is based upon needs identified by our annual processes for comprehensive statewide needs assessment. The plan is updated and kept current with ideas or issues identified from ongoing client satisfaction surveys, employee requests for additional training on specific topics, and internal data collection from the NCBVI data management system.

B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

Significant knowledge from research and other sources is disseminated to staff members; thus ensuring access to new knowledge and learning in the field of vocational rehabilitation. The system of staff development provides for on–going renewal and enhancing of the individual and the agency's organizational knowledge and expertise.

We have an annual State Staff meeting in which staff who went to different training provide a report and share the knowledge learned from the training they attended. In addition, Each of the three districts, the Training Center, and the NBE program have at least one meeting per month to talk about their team progress and some results from research and resources available are share at this meetings. Furthermore, whenever a staff member receives information relevant to the services we provide, this is being shared via email to all staff.

5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

NCBVI has several employees across the State of Nebraska with bilingual skills in English and Spanish. Independent contracts are established as needed to obtain services from individuals who are able to communicate in the native language of applicants or clients who have limited English speaking ability or in appropriate modes of communication. Contracts have included, but are not limited to American Sign Language, including Tactile Signing for Deaf–Blind individuals, Spanish, French, Turkish, Arabic, Vietnamese, Burmese, Kareni, Swahili and others according to the needs of applicants and eligible individuals.

6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

NCBVI coordinates with the Comprehensive System of Personnel Development under the Individuals with Disabilities Education Act (IDEA) in several ways. NCBVI and a team of educators and other stakeholders established a Protocol for educators and NCBVI counselors, for providing high quality services to blind and visually impaired children and youth in Nebraska. The handbook is titled Opening Doors: A Transition Guide. This tool serves as a vehicle for educating parents and families, service providers, educators, and others about the best way for children from birth through transition age, to obtain the education and rehabilitation services that will move them into adulthood successfully. NCBVI provides information to educators and to VR personnel about training opportunities relevant to personnel development in the fields of both education and vocational rehabilitation. NCBVI counselors, especially those who work with transition age clients, meet on ongoing basis with vision teachers in their state wide conferences and attend regular meetings with NCECBVI. Additional joint personnel development efforts will be held when specific issues of mutual concern are identified. For example, teachers of blind children from the public school system provide

presentations to NCBVI at Staff Meetings. NCBVI staff members provide presentations at training sessions of the school system, university and college classes, and other opportunities which arise. We will continue to explore ways to assure success in education and quality employment. One avenue will be collaborating with the WinAHEAD organization (Western Iowa and Nebraska Association on Higher Education and Disabilities). On an ongoing basis, the primary emphasis will be individual communication between NCBVI counselors and parents, teachers and others in the education system.

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;

Nebraska Commission for the Blind and Visually Impaired (NCBVI) is the Designated State Agency responsible under State law for operating the vocational rehabilitation program for the blind in Nebraska. A governing board, the majority of whom are persons who are blind or visually impaired, appointed by the Governor of the State of Nebraska serves to assure the agency is consumer–controlled. NCBVI undertakes to review and analyze the effectiveness of services and consumer satisfaction with services provided by the Commission, vocational rehabilitation services provided by other state, public and private entities, and employment outcomes achieved by eligible individuals receiving vocational rehabilitation services from NCBVI, to assure high quality, career track employment outcomes, with health and other employment benefits, wages comparable to state wages for non–disabled persons, and equity for persons of minority status. Formal Comprehensive Statewide Needs Assessment (CSNA) During FFY 2018, NCBVI established a contract with the Louisiana Tech University-Professional Development and Research Institute on Blindness Research and Training LLC, which addressed needs on serving students under the Pre-Employment Transition Services to cover the period of 2014 through 2018. The assessment included surveys of blind clients closed either in status 26 or 28, members of NCBVI staff, and employers who have had experience with NCBVI staff and clients. Semi–structured interviews were conducted with other key informants. In addition, existing data from various sources was analyzed, such as the RSA–911 data for NCBVI, American Community Survey data, and Bureau of Labor Statistics labor and economic forecasts. Data gathering began in February 2018 and continued through June 2018. Analysis was conducted primarily during the third quarter of Fiscal year 2018. The full report was provided to NCBVI in June 2018. The next Statewide Assessment will cover the period of FY 2019 through FY 2022.

Serving consumers with the most significant and multiple disabilities is a need that grows in complexity and numbers. The agency will work to increase staff members' expertise in a variety of disabilities, including deaf–blindness, brain injury, and others. In addition, it is important to partner with other entities specializing in serving persons with specific disabilities other than blindness. There is a need to increase competitive employment outcomes for clients with multiple disabilities. Caseloads were reviewed to identify clients with multiple disabilities and strategies were developed to more effectively provide the services needed by those individuals.

B. Who are minorities;

The population of Nebraska is not that diverse in terms of race and ethnicity, but diversity has been increasing. The agency works to assure that contacts are made to minority populations in every area of the State. The Louisiana Tech University- Professional Development and Research Institute on Blindness results from 2018 show that there is a need to analyze the work being done. It is important to make meaningful contacts with diverse populations, to effectively reach persons who might be eligible for agency services. Materials were revised to have different languages available, including print, online, and video productions for public use. A translation tool is available at the agency website, allowing the user to read all content in a wide range of language options. There is a need to increase the proportions of people served from minority populations who achieve competitive employment outcomes. The efforts to date have focused on increasing outreach to all Nebraskans. This effort will continue, along with examination of barriers that inhibit successful outcomes. Efforts statewide assure that regardless of race or ethnicity, quality services are provided at referral, application, and throughout the VR process.

C. Who have been unserved or underserved by the VR program;

Several data sources indicated that services to consumers with multiple disabilities need improvement. According to the RSA–911 analyses, consumers with multiple disabilities were competitively employed at a significantly lower rate after receiving services than other consumers. In the consumer survey, respondents who had multiple disabilities reported a greater need for services in many areas compared to those with blindness or visual impairment only. In terms

of services for which a need remained after the completion of their rehabilitation program, respondents with multiple disabilities had similar or higher remaining needs in all areas. They reported a higher remaining need (compared to those without multiple disabilities) in 47.4% (n=9) of the services asked about. Almost all staff (94.7%) indicated that improving services to consumers with multiple disabilities was a moderate or critical need. This item had the fewest number of people who did not consider it a need (only one staff person rated this as limited or no need). Four of the eight key informants identified persons with multiple disabilities as a group that was unserved or underserved by NCBVI. One key informant mentioned that counselors tended to not have knowledge about other disabilities, and there was a need for them to have this knowledge in order to serve this group appropriately. In terms of suggestions by participants about how to better serve this population and meet their needs, four key informants indicated that it is important for NCBVI to partner with other agencies or organizations that have some expertise with the additional disabilities of this group. Three staff members mentioned that additional training or professional development about other disabilities was needed, and two staff members suggested partnering with other professionals or organizations that have expertise with other disabilities.

NCBVI's last CSNA was completed in June 2018.

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

Assistance related to employment is another identified need. The needs can be broken into three major areas: career exploration and guidance, searching for and obtaining employment, and working with employers on accommodations and other on–the–job requirements. More specifically, the needs include help with finding a job, finding job leads or contacting employers, working with employers on job accommodations, completing applications, exploring career options, and developing clients' skills for seeking and obtaining competitive employment. The world of work and life in general requires increasing needs for technology related skills and equipment. The highest focus of need from consumer surveys was in this area. Training in access technology is an area of high need, according to the assessment. This is consistent with our ongoing needs assessment with consumers statewide, described below, which we conduct every year. Employers surveyed also indicated that assistance with technology will help them to hire and retain employees with vision impairments. The Technology Team, works to enhance their own expertise, to train other staff, to provide opportunities for training consumers, and to identify additional opportunities available from external resources. Another area identified is the importance of partnering with other organizations, agencies, groups, etc. In particular, other components of the statewide workforce development system are key entities with whom to partner. Much is done and will continue to be done throughout the state. Staff members in each geographic area are encouraged to engage in networking opportunities with businesses in their locale. We engage with the Local Workforce Boards in all parts of the State. This helps to assure that we do have knowledge of and interaction with other components of the workforce system statewide. When staff members learn of new entities, or ones that have not worked with NCBVI in the past, the information is shared with other staff and consumers who need it. NCBVI is strongest when collaborating with and learning from people and groups that may have resources beyond its own. With the exception of Omaha and Lincoln metropolitan areas, most of the state is rural. There are small and medium sized towns sprinkled across the state. Still it is critical that we work to ensure our ability to achieve competitive employment outcomes for clients living in rural Nebraska. NCBVI data show that the rates of acceptance for services and competitive employment are actually slightly better for rural–based clients than for urban. However, there may be a perception amongst individuals who feel isolated and unable to connect with employment, leading to a sense that this is an unmet need. It is also not unusual for VR Counselors in the rural areas to be frustrated by limited employment opportunities for their clients. The fact that this need emerged as critical in the survey reinforces the need to strengthen networking efforts, outreach to potential clients and employers, and building skills among agency staff to make sure that all areas of the state are served fully, including rural, urban, and metropolitan.

NCBVI's last CSNA was completed in June 2018.

E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

NCBVI is committed to the provision of rehabilitation services to blind and visually impaired children and youth and their families as early as possible in the child's development. Special programs such as Project Independence for children between the ages of seven and twelve stress the importance of self–confidence and independence using the alternative skills of blindness. Programs for blind and visually impaired teens such as WAGES (Work and Gain Experience in the Summer) and the Mentoring for Excellence provide valuable work experiences and, opportunities for developing social and advocacy skills needed for success in later life. Other programs such as Employment Conference, Blind and Socially Savvy and the College Workshop also help blind and visually impaired students make

the transition to life after high school. In the coming year, NCBVI will increase efforts promoting more job opportunities for blind and visually impaired youth in their home communities throughout the school year. NCBVI's field supervisors and the Training Center supervisor continue strengthening the relationship between NCBVI and schools statewide on behalf of blind and visually impaired students. Fifteen percent (15%) of funds allocated to NCBVI for vocational rehabilitation services are dedicated to providing pre-employment transition services to blind and visually impaired students between the ages of 14 and up to but not including 22, and; 50 percent (50%) of funds for supported employment services are committed to providing pre-employment transition services to blind and visually impaired students in the same age group. Increasing the number of blind and visually impaired youth in transition achieving their individual employment goals is a major objective for NCBVI in FY 2020. Transition-aged clients are encouraged to elevate their expectations for personal achievement. This can translate to higher education, often delaying their ultimate employment. It may take more years to reach that goal, but when they do, it will be in a career that will pay well, have benefits, and the chance for promotions. All closures that did not achieve their vocational goals, including Transition clients who were closed unsuccessful from active services, are studied for more effective intervention methodologies. We will determine if there are differences between those who choose to continue their education and those who do not. We also will explore any commonalities among cases closed unsuccessfully. There may be strategies which can be used to improve the employment outcomes and the resulting rehab rate.

NCBVI's last CSNA was completed in June 2018.

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

For the effort to establish, develop or improve community rehabilitation programs (CRPs), NCBVI collaborates with a wide range of community partners statewide, working together to develop and improve services, especially with the new RSA requirements for supported employment. NCBVI provides services and training on all areas regarding blindness and visual impairment, thus we do not find the need to establish new CRPs to provide vocational rehabilitation services for the blind in Nebraska. We work mainly with CRPs that provide services and training for the most significant disable. According to the most recent CSNA of June 2018, the area that needs improvement is for NCBVI staff having more knowledge on how to work with clients with the most significant disabilities, and for the CRPs to learn more about blindness. Therefore, NCBVI field staff is working with CRPs on common clients and sharing expertise. Agency staff members also work with CRPs and independent living centers to assure that services are coordinated and meeting the needs of Nebraskans with disabilities, especially those who are blind or visually impaired along with multiple disabilities. In addition to services specific to individuals, collaboration on other projects occurs as the need and opportunity arises. The activities enable NCBVI to inform many persons about the services available to individuals who are blind, thus expanding opportunities to those who are, or who may become, eligible for services of the Vocational Rehabilitation or the Supported Employment program. The agency collaborates with the Nebraska Department of Health and Human Services–Division of Developmental Disabilities services (NDHHS–DDD) to identify potential clients, coordinate service plans and share funding for those individuals in the System who are described as blind and visually impaired. Efforts have been initiated to establish a similar relationship with the Department of Health and Human Services–Division of Behavioral Health (NDHHS–DBH) on behalf of blind and visually impaired clients with behavioral health issues. For the most part, job coaching to SE clients is provided through contracts with community rehabilitation programs. DDD provides ongoing funding for the job supports. Contracts with CRPs and coordination for services all serve to expand, develop and improve such programs across the State of Nebraska. Part of the Comprehensive Statewide Needs Assessment from June 2018, gathered information regarding this question from the staff survey and the key informant interviews. One item on the staff survey addressed this, and staff suggested to continue to improve our partnership and collaboration with CRPs. NCBVI currently partners with community programs to identify and to address consumer needs.

NCBVI's last CSNA was completed in June 2018.

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

With the increased emphasis on Pre-Employment Transition Services, students and programming to enhance their skills in the areas of job readiness, community based integration skills and exploration of potential pathways in both college and/or job settings, NCBVI has adopted several new strategies designed to assess both the needs of our staff and clients with regard to the transition process. An Agreement was signed by NE-VR and NCBVI on December 18, 2019 stating that the age to provide Pre-ETS to students with disabilities is age 14 up to 22.

The following five needs were mentioned the most frequently at the most recent CSNA, from June 2018:

- Youth and their families wished they had known about NCBVI and the services available to their child earlier in junior high and high school.
- Youth and their families wished that NCBVI could provide more skills training during the school year, such as independent living skills and cane travel.
- Youth and their families wished that NCBVI could provide more assistance, both in the summer and during the school year, for youth to find and maintain part-time jobs and internships.
- Youth and their families wished that NCBVI staff who mentioned services, such as cane travel training and the WAGES program, would have followed up and ensured that these services were actually provided.
- Youth and their families wished that NCBVI programs and services took into consideration the varying needs and life situations of students with different levels of functional vision.

In order to address the needs outlined above, NCBVI will adopt the following strategies:

- The Nebraska Commission for the Blind and Visually Impaired will explore additional strategies to reach out to blind high school students, their families, teachers of the visually impaired, and high schools. NCBVI field counselors will attend the Individualized Education Program meetings of blind and low vision students, and offer additional blindness skills training and employment readiness training to students and their families as part of their Individualized Education Program. NCBVI staff continue to attend Stakeholder meetings at NCECBVI, the statewide program for blind and visually impaired youth, meetings of the transition practitioners committees, and various district meetings of teachers of the visually impaired, in an effort to assess the needs of students and teachers and to offer our expertise in meeting these needs. The above will help teachers of the blind and visually impaired to know that the Commission for the Blind is the rehabilitation agency for blind youth.
- Nebraska Commission for the Blind and Visually Impaired in conjunction with the Nebraska Department of Labor will explore apprenticeship opportunities for blind students to gain experience in the workforce and develop work readiness skills.
- Nebraska Commission for the Blind and Visually Impaired will develop a follow-up checklist for staff to use with Pre-ETS program participants, to assist participants in continuing to use the skills and tools they learned during NCBVI programs and to provide additional information about resources and opportunities.

k. Annual Estimates

Describe:

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

Utilizing data from the U.S. Census Bureau from 2013-2017, there are 21,405 Nebraskans aged 14-64 who have indicated vision difficulty or roughly 1% of the population of Nebraska.

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

A. The VR Program;

NCBVI anticipates serving 500 clients in FY 2020 and 525 in FY 2021.

B. The Supported Employment Program; and

NCBVI anticipates serving 80 clients in FFY 2020 within Supported Employment and 85 clients in FFY 2021.

C. Each priority category, if under an order of selection.

N/A

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

0

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.

The total cost of services for the number of individuals estimated to be eligible for services in FFY 2020 is $2,565,000 and FFY 2021 is $2,715,000

l. State Goals and Priorities

The designated State unit must:

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*

Nebraska VR's State Goals and Priorities have been aligned to the strategic vision of Nebraska's Workforce Development System. The vision maintains a shared focus on seamlessly providing services to job seekers, including individuals with disabilities, at all stages of employment and providing a trained and qualified workforce for businesses. The Needs Assessment Survey results were evaluated with Nebraska VR's Leadership Council and the Nebraska State Rehabilitation Council's Executive Committee meeting in January 2020.

During the development of the WIOA State Plan, the SRC Executive Committee and Council were consulted and provided an opportunity to comment. A summary of the comments provided by the SRC include:

- Goal 1: There were no additions.
- Goal 2: An SRC member asked questioned how this would be measured.
- Goal 3: There were no additions.
- Goal 4: The SRC members asked that SRC and educators be included.
- Goal 5: There were no additions.

- Strategy 1: The SRC members asked that SRC and educators be included. It was suggested to identify rural as a specific strategy for job development and job coaches in the rural areas of Nebraska.
- Strategy 2: It was suggested to add the VR/ATP monthly meetings and VR is a member of the ATP Advisory Council.
- Strategy 3: It was suggested to add SRC and educators to the second bullet. It was suggested to add sign language interpreting to the fifth bullet. It was suggested to consider Trans-Act as a resource to the sixth bullet.
- Strategy 4: It was suggested to add as a bullet point, continued training for VR staff related to IEP development and participation in meetings.
- Strategy 5: SRC offered Family Employment Awareness Training (FEAT) as an example of this strategy.
- Strategy 6: There were no comments.
- Strategy 7: There were no comments.

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

Goal 1: Increase the number of individuals who exit VR supported employment with competitive integrated employment.

- Baseline: In PY 2019 Total SE cases closed: 103; Total successful: 47; Percentage: 45.63% people who received VR supported employment (SE) or customized employment exited with competitive integrated employment.
- PY 2020 Target: 47.0% of people who receive VR supported employment (SE) or customized employment will exit with competitive integrated employment.
- PY 2021 Target: 49.0% of people who receive VR supported employment (SE) or customized employment will exit with competitive integrated employment.
- PY 2022 Target: 51% of people who receive VR supported employment (SE) or customized employment will exit with competitive integrated employment.
- PY 2023 Target: 53% of people who receive VR supported employment (SE) or customized employment will exit with competitive integrated employment.

Goal 2: Increase the number of students/interns completing Project SEARCH and obtaining competitive integrated employment.

- Baseline: During outcome years September 2015-August 2018, Nebraska Project SEARCH sites report an aggregate 98.8% (289/293) completion rate for Project SEARCH interns. Of those completers, 187 (64.7%) are reported as employed following the Project SEARCH program.
- PY 2020 Target: 66% of Project SEARCH interns become competitively employed following completion of the program.
- PY2021 Target: 68% of Project SEARCH interns become competitively employed following completion of the program.
- PY2022 Target: 69% of Project SEARCH interns become competitively employed following completion of the program.
- PY2023 Target: 70% of Project SEARCH interns become competitively employed following completion of the program.

Goal 3: Improve quality and consistency of supported employment services through the development and implementation of best practices for service providers.

Goal 4: Improve communication with clients, businesses, stakeholders, service providers, core partner programs, SRC, educators, and staff members.

Goal 5: Develop cultural competencies to ensure equitable access to Nebraska VR services.

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;

See 3A, 3B, 3C.

The above goals and priorities are consistent with the most recent statewide comprehensive assessment as previously described.

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

For the first two (2) years of PY 2020-23 Plans, the VR program authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV of WIOA, will have two (2) full years of data available for the Measurable Skill Gains indicator only. Therefore, Nebraska VR has designated the following indicators as baseline for the VR program for PY 2020 and PY 2021.

- Employment (2nd quarter after exit)
- Employment (4th quarter after exit)
- Median earnings (2nd quarter after exit) and
- Credential attainment rate

Nebraska VR will continue to collect and report on all indicators including those that have been designated as baseline. The actual performance data reported by this program for indicators designated as baseline for PY 2020 and 2021 will serve as baseline data for future years. Nebraska VR will submit expected levels of performance for these indicators for PY 2022 and 2023.

The effectiveness of serving employers indicator is a shared outcome across all six (6) programs in the state. In accordance with Appendix 1, states are not required to submit an expected level of performance for the effectiveness in serving employers for PY 2020 and 2021. Nebraska core programs are expected to collect data and report on this indicator for PY 2020 and 2021 as they did for PYs 2016-2019.

Each core program will submit an expected level of performance for all the other indicators with the exception of the four (4) indicators designated as baseline for the VR program in PY 2020 and 2021. VR will work with the Department during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as baseline. VR will update its plan to include the agreed upon negotiated levels of performance.

Measureable skill gains baseline —

- PY 2017 — 21.3%
- PY 2018 — 29.9%

Expected levels of performance —

- PY 2020 — 14%
- PY 2021 — 15%
- PY 2022 — 15.5%
- PY 2023 — 16%

The expected levels of performance were not only based on two (2) years of baseline data but also PY 2019 Q1 and projections for Q2. There was a decrease in performance from PY 2018 which is accounted for in the expected levels of performance.

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.

NCBVI goals are based on factors identified through analysis of the comprehensive statewide assessments, both the contracted research project and the ongoing public forums, and results of federal RSA Monitoring and oversight. The operation and effectiveness of the VR–B program is reviewed by the NCBVI Board of Commissioners at quarterly meetings, reviews of reports to federal and state entities, and follow–up from previous RSA Monitoring activities and reports.

m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:

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

NCBVI was under an Order of Selection since March 2019. However, the State legislators increased our funding level and we are able to serve all clients in the wait list, and; by March 2020 we will be off Order of Selection. . Policy and procedures are in place to implement Order of Selection should it ever be imminent again. It is not expected that an Order of Selection will be required during the second part of FY 2020 and FY 2021.

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

Since our total VR grant award is split between NCBVI and general VR, our agencies have collaborated to ensure the total amount awarded is spent annually on Supported Employment clients. We have signed documentation to transfer a portion of our SE funds to general VR in order to satisfy RSA guidelines. NCBVI and VR will continue to work together on an annual basis to determine if funds need to be transferred again. For NCBVI, we have two goals for the provision of SE services:

Goal 1: For the Supported Employment (SE) program, NCBVI is to develop appropriate individualized SE placements for blind and visually impaired persons with developmental disabilities.

Priorities for Goal 1:

1. Identify clients who are eligible for receiving SE services.
2. Increase training opportunities that NCBVI can offer to clients in the SE program.
3. Work with area employers to increase opportunities.
4. Learn about post-employment services.

Goal 2: It is also the goal of NCBVI's SE program to develop appropriate individualized SE placements for blind and visually impaired persons with significant secondary disabilities including brain injury, mental illness, hearing impairment, or other multiple disabilities occurring after consumers have reached the age of 21.

Priorities for Goal 2:

1. Education of NCBVI staff.
2. Develop training opportunities that NCBVI can provide consumers after the completion of their secondary education.
3. Develop employment opportunities for consumers.

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

NCBVI typically does not expend funds to extended services. Generally, if the individual has a secondary disability other than a significant behavioral health condition or autism, there may not be a source of ongoing financial support for these services extending beyond the time allowed for NCBVI support. In such cases, the Deputy Director of Services and the immediate supervisor of field services works with the NCBVI Counselor involved to identify possible resources for the ongoing support, such as developing a PASS (Plan to Achieve Self Sufficiency) or personal resources. With any extended services funded by NCBVI for a youth, they will be utilized only up to 48 months or until the youth with a disability turns 25.

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.

NCBVI typically does not expend funds to extended services. Our agency will utilize outreach efforts to various employers to increase their knowledge about our clients. Our agency also partners with the American Job Centers in Nebraska.

o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

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

Based on NCBVI's 2018 Consumer Needs Assessment:

1. Clients who were surveyed and unemployed, listed lack of transportation was cited as the single biggest factor in their inability to find or keep work. As such, our priority is to utilize the NOI to continue to provide these services to Pre-Employment Transition Services eligible students and utilize our 15% set aside to do so. In the specific area of supported employment, staff cited supported employment as an area that needed additional focus and improvement on par with many other services, but not better or worse than many other services offered. Key informants did cite supported employment as an area that was very important and needed improvement. NCBVI has a contact at DD within the Nebraska Workforce and attends meetings at our office with district supervisors, Deputy Directors and Executive Director in attendance to maintain a relationship with the agency and determine best avenues for supporting these clients.
2. When staff were asked about their effectiveness in working with underserved populations, many felt that the needs of this group are the same as the needs for all other consumers; however, they felt that the Native American population, recent African immigrants, non-English speaking persons and the older blind were particularly vulnerable and needed additional support. When staff were asked what the Commission could do better to meet this need, the largest consensus revolved around the need for additional staff training on serving these populations. NCBVI worked with the State of Nebraska to appropriate more funds to Older Blind consumers. This was accepted by the legislature and NCBVI has begun work on more opportunities to expand our services to this population through technology devices and aids as well as hosting conferences. With our re-allotment funds, leadership is looking to provide further training in the areas of minorities and other populations. Statistically Nebraska is a majority white/Caucasian populated state but we are always looking at ways to make sure our services are available to all consumers, regardless of race or ethnicity.
3. The survey asked what the Commission could do more of to increase their presence or use of other statewide Workforce components, they stated:
   - Host a program for employers, create a video or pamphlet of blind people of Nebraska performing their jobs independently or with accommodations.
   - Partnerships with Region V and other agencies. Try to be respectful of the complicated relationships between all the agencies.
   - transportation especially in rural areas

NCBVI is a part of the American Job Centers and also has completed MOUs with Nebraska DHHS, the Nebraska Center for the Education of Children who are Blind and Visually Impaired (NCECBVI), the Department of Education, The Enrichment Foundation, The Greater Nebraska Workforce Development Board, Nebraska VR and the Nebraska Educational Service Units for Project Search. These MOUs will continue to foster the work we have accomplished as a part of WIOA.

1. The Key Informants survey consisted entirely of parents, teachers or special educators for youth. A summary of the major themes noted by key informants related to the existing need were:
   - Help with transition into adulthood...
   - Services in rural areas
   - I think there is a gap ... for services for kids with multiple special needs. Our son is blind (ROP Stage V & has Autism).
   - transition and inclusion with their typical peers

NCBVI has two physical offices and staff on other four rural areas throughout the State of Nebraska, to reach blind and visually impaired persons in their home communities. Vocational Rehabilitation staff travel around their areas to meet with referrals and clients, to educate the public and employers, and to reach out to individuals who may need our services. NCBVI counselors and technology specialists attend IEP meetings at the school as well as are in constant communication to promote our services. We continue to provide staff with trainings to further educate on ways to include all clients in group activities and provide the necessary supports. Our districts have also started to provide workshops for Pre-Employment Transition students to attend and learn skills in a fun and educational environment with their fellow peers.

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*

NCBVI provides assistive technology services throughout the state of Nebraska to blind and visually impaired consumers. NCBVI's team of three technology specialists provides assessment, consultative support, and training on mainstream and access technology products. The specialists participate in trainings and research to discover technology solutions and provide consumers the ability to weigh the pros and cons of specific technologies to support their informed choice. Technology training is also provided in the NCBVI Center for the Blind. In addition, several VR counselors and Orientation Counselors are very familiar with accessible technology, as they are users themselves, and are available to help with basic assessment and teaching of some adaptive equipment. We also contract with third parties to make software accessible and with others to provide training when additional consultation is needed. NCBVI collaborates with the Assistive Technology Partnership (ATP) throughout the state. NCBVI will purchase hardware and software to make science lab accessible to blind students. Potential trainors and blind students will take training about the use of these software and hardware as part of the overall package.

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*

Through the leadership of the NCBVI Deputy Director of Services and the three district Supervisors, field Counselors work to identify and serve blind and visually impaired individuals who are of minority backgrounds, have the most significant disabilities, and those who have been unserved or underserved by NCBVI. Direct contact is made with organizations and populations in each area of the state, to assure that the availability of services is made known to all who might be eligible.

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)*

There is an emphasis upon providing effective services to the transition population, particularly pre–employment transition eligible students. From the RSA perspective, as well as this agency, it is crucial to increase successful outcomes for clients who begin rehabilitation services from the age of 14 through age 24. NCBVI closely reviews all transition cases closed without achieving employment outcomes. Through this process, approaches and services are analyzed to determine how successes for transition clients can be increased. At the same time, case reviews are conducted on all transition cases closed that did achieve employment outcomes. The level and types of services provided and the success achieved are examined based upon benchmarks established by RSA and WIOA common measures.

An Agreement was signed by NE-VR and NCBVI on December 18, 2019 stating that the age to provide Pre-ETS to students with disabilities is age 14 up to 22.

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

Workshops are provided in various locations around Nebraska to spotlight the capabilities of blind individuals. The agency partners with other agencies, consumer organizations, communities, and groups; including Disability Rights Nebraska, Nebraska Assistive Technology Partnership (ATP), the Statewide Independent Living Council, Olm Stead State Plan Steering Committee, Workforce Development Councils, educational entities, hospitals, multi–cultural centers, community rehabilitation programs (Martin Luther Homes, Quality Living), and a wide range of other entities.

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

As more data becomes available utilizing the six Common Performance measures we will look at how to best improve our performance. We currently track wages received through Unemployment Insurance and self-reported mechanisms to satisfy the percentage of program participants who are in unsubsidized employment during the 2nd and 4th quarter after program exit and also the median earnings of those participants during the 2nd quarter after exit. By tracking these in our case management system, we can verify if the client has been at the same employer during those quarters after exit. Our staff work with clients and schools to obtain grades, progress reports and certificates of completion to verify educational credential attainments and measurable skill gains. The credentials and skill gains are not entered into our

case management system until the documentation has been obtained. We have been meeting with the Department of Labor to verify they have all of the information needed to report on the effectiveness of serving employers.

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

Various activities enable NCBVI to inform other components of the statewide workforce development system about the services available to individuals who are blind, thus expanding opportunities to those who are, or who may become, eligible for services of the Vocational Rehabilitation or the Supported Employment program. At the Statewide level, NCBVI is actively engaged with the WIOA Core Partners efforts; in local workforce areas, NCBVI staff collaborates with other components of the workforce system to assure there is knowledge of and access to providing services to persons who are blind or visually impaired. The agency website is updated continuously and provides information to the public about available services and resources, avenues to apply for services, and ask questions, and so forth. In 2020-2024, employment conferences for clients will continue as long as available funds and resources allow. The conferences are an effective approach to expand and improve efforts to secure high quality employment outcomes for job ready consumers and to enable pre–employment services clients to gain skills and resources for achieving employment. Included in the conferences are motivational speakers, sessions on resume writing, interviewing and related skills, technology demonstrations, mock interviews with local business people, and a job fair with local businesses present. Employers have an opportunity to meet blind job candidates in a setting conducive to exploring the options for both blind consumers and for business representatives. Clients learn and practice many skills necessary to succeed in the world of work. Instructional videos developed and produced by NCBVI continue being used by clients, for self–study on blindness skills, between appointments with Rehabilitation Counselors and teachers.

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

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

The strategies NCBVI has adopted to achieve the goals after discussion of the 2018 CSNA results are:

1. NCBVI staff have partnered with Project Search, participate in local educational outreach meetings, developed a MOU with NDE to work in the local school districts, conducts educational consultation with schools, attend ESU Resource and Parent Resource Nights to network with Special Education teachers and directors, and meet quarterly with vision teachers within districts and the Nebraska Center for Education of Children that are Blind and Visually Impaired to build relationships with schools and vision teachers across the state.

2. NCBVI have staff that are members of the local workforce boards, attend agency partner forums across the state, had training on Apprenticeships with the NDOL, attend Employ Link, Employ Oma, Employ GI, Employ Kearney, Employ Pan Handle, Employ North Platte, and Employ Norfolk, participate in the Omaha Youth Council to address WBLE's and summer employment opportunities for students, and have frequent interactions with Job Corps. NDOL has had much turnover, and apprenticeships are an on-going partnership to develop with NDOL.

3. NCBVI developed a Pre-ETS checklist as a follow-up guide for Pre-ETS consumers to continue the acquisition and progression of skills under Pre-ETS services.

4. NCBVI collaborates and participates on a statewide basis for the Job Fair for Project Search, participates in the two job fairs a year with Employ Link, and collaborated with Heartland Workforce Solutions job fairs on a quarterly basis. NCBVI will provide an employment conference in 2020.

5. NCBVI staff conduct outreach and network with area businesses on a regular basis across the state with a focus of either full-time or part-time employment as well as explore WBLE and internship opportunities. NCBVI districts are developing and maintaining an employer spreadsheet to track these employer outreach and networking contacts.

6. NCBVI developed and provided agency staff with a list of free resources to assist consumers exploring and pursuing self-employment as a vocational goal.

7. NCBVI staff were provided a list of internal resources (i.e. agency staff) who are a good resource for supported employment.

8. NCBVI has developed a contract to provide training to our staff on placement strategies for consumers with significant multiple disabilities in 2020. NCBVI also addresses these topics and discuss strategies at statewide

training events and local partner meetings with NDOL, Employ groups, and workforce partner meetings across the state. NCBVI supervisors meet and share what is happening in their districts monthly, which includes local employer tours as well as the Heartland Workforce solution CENT Tours of businesses by sectors which allow individuals to learn about available jobs, work skills needed, and participate in a job fair.

9. NCBVI staff were provided an internal staff resource directory for assistance in diverse consumer needs.
10. NCBVI provided a statewide Older Blind Conference in 2019 and offers group teaching options across the state in each district.

B. Support innovation and expansion activities; and

Title I Innovation and Expansion funds is being used to cover the subscription fee for the operation and maintenance of AWARE, the data management system used by NCBVI. Work with the data management system will address all goals. This data management is enabling NCBVI to analyze the effectiveness of all parts of the system. The data based results can be used to add value to overall efforts of the agency, achieve established goals, and to identify future needs and challenges.

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.

Partnering with other organizations throughout Nebraska and the nation is crucial to assuring equitable access to and participation of individuals who are blind and visually impaired in the State VR and SE services programs. Resources external to NCBVI can help to address areas and issues of potential barriers. Partnering with other agencies, components of the statewide workforce system, consumer organizations and experts expands the capacities of NCBVI and of those other entities. It is a viable way to better serve hard to reach consumers and to improve services with limited funding. Particularly in rural areas, collaboration improves outreach and services to those living in less–populated communities.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals

Mission

The mission of NCBVI is "Empowering Blind Individuals, Promoting Opportunities, and Building Belief in the Blind." NCBVI's primary priority is to enable persons who are blind and visually impaired, including those with multiple disabilities (i.e., hearing impairment, brain injury, mental illness) to achieve their individual goals for competitive integrated employment (including supported employment). A secondary priority is to enable persons who are blind and visually impaired, including those who also have multiple disabilities, to achieve their individual goals to live independently and to be full participants in their home communities. Particular emphasis is given to the provision of pre–employment transition services to blind students ages 14 years and up to but not including age 22.

Goals

NCBVI's goals are based on factors identified through analysis of comprehensive statewide assessments, the contracted research projects, and ongoing public forums. 2020 State Plan program goals for NCBVI are extensions of the goals identified on the 2018 State Plan:

1. Increase the number and percentage of clients achieving full-time (31+ hours per week) competitive employment outcomes.

Thirty-three (33) VR clients were closed in Status 26 during PY 2019 indicating that employment goals were achieved, compared to fifty-five (55) in PY 2018. In PY 2019, 66.67% of cases closed in Status 26 achieved full-time employment, compared to 52.73% achieving full-time employment in PY 2018. Our goal specifically focused on employment with more than 31 hours per week. The goal of increasing the percentage of status 26 closures achieving full-time employment in PY 2019 was met; however, the goal of increasing the number of status 26 closures achieving

full-time employment in PY 2019 was not met. Overall, in the nation there is a national trend of less placement but we have assist clients to obtain jobs with more hours.

2. Increase the ratio of average hourly earnings of clients who become employed compared to average earnings in the state.

The average hourly wage of cases closed in status 26 during PY 2019 was $18.19. Using the Department of Labor (DOL) estimates for the average overall hourly wage for Nebraska in the third quarter of 2019 ($23.32), the ratio of average hourly wage of cases closed in status 26 with DOL estimates is .78. The average hourly wage of cases closed in status 26 during PY 2018 was $15.08. Using DOL estimates for the average hourly wage for Nebraska in the third quarter of 2018 ($22.46), the ratio of average hourly wage of cases closed in status 26 with DOL estimates of the average overall hourly wage in Nebraska is .67. Goal number 2 was met.

3. Increase the rehabilitation rate for transition aged clients in PY 2019 over the previous fiscal year.

NCBVI will start reporting on start and end dates of Pre-Employment Transition services on students starting in PY 2021 to align with new RSA 911 regulations. This will better gauge a rehabilitation rate for this population. In PY 2018, NCBVI served 120 students who were qualified to receive Pre-Employment Transition Services. In PY 2019, we served 147. Our number of students increased because NCBVI is committed to provide rehabilitation services to blind and visually impaired students. NCBVI also prefers to start working as early as possible in the child's development. Special programs such as Project Independence for children between the ages of seven and fourteen stress the importance of self–confidence and independence using the alternative skills of blindness. Programs for blind and visually impaired teens such as WAGES (Work and Gain Experience in the Summer) and Mentoring for Excellence provide valuable work experiences and opportunities for developing interpersonal skills needed for success in later life. Other programs such as the College Workshop and Blind and Socially Savvy also help blind and visually impaired students make the transition to life after high school. In the coming year, NCBVI will increase efforts promoting more job opportunities for blind and visually impaired students in their home communities throughout the school year.

Our field supervisors, the Transition Services Specialist and counselors are strengthening the relationship between NCBVI and schools statewide on behalf of blind and visually impaired students and also their parents/guardians. Fifteen percent (15%) of funds allocated to NCBVI for vocational rehabilitation services are dedicated to providing pre–employment transition services to blind and visually impaired students between the ages of 14 and up to but not including 22; 50 percent (50%) of funds for supported employment services are committed to providing transition services to blind and visually impaired youth up to but not including age 26. As mentioned above, in PY 2019 we served 147 students under Pre-ETS, which was higher than previous years. Increasing the number of blind and visually impaired students served with Pre-ETS services and youth with transition services achieving their individual employment goals is a major objective for NCBVI in PY 2020. Transition–aged clients are encouraged to elevate their expectations for personal achievement. This can translate to higher education, often delaying their ultimate employment. It may take more years to reach that goal, but when they do, it will be in a career that will pay well, have benefits, and the chance for promotions. We will explore any commonalities among cases closed unsuccessfully. There may be strategies which can be used to improve the employment outcomes and the resulting rehab rate.

An Agreement was signed by NE-VR and NCBVI on December 18, 2019 stating that the age to provide Pre-ETS to students with disabilities is age 14 up to 22.

4. Improve the quality assurance system.

In 2017, NCBVI launched AWARE, a client database management system, to replace eForce, the previous system. AWARE is more comprehensive and effective on all levels of the process, such as establishing electronic reminders of service deadlines; ways for staff to communicate with each other about client needs and case service activities; mechanisms for administrators to review work that is done, accomplishments made, and to assess gaps in either the data management system itself or the agency's service delivery system. As there is more time using the new system, NCBVI staff is better able to track effectiveness of programs and in other ways, assure that high quality services are provided to accomplish successful outcomes for clients.

To achieve the goals and priorities of achieving high–quality successful employment for clients, NCBVI is using many approaches. Each situation is individualized, thus the strategies and solutions for each client is unique. This approach is productive in many ways. It helps each individual client to clarify personal goals and then to achieve those goals. It helps to model for the individual that throughout life, one can accomplish new things by thinking creatively and having

the confidence to try new approaches. It also helps rehabilitation staff by reinforcing creative, individualized thinking, which in turn stimulates creative thinking for the next client who walks in the door.

Clients are encouraged to examine whether, if not for blindness, he or she would still be in the workforce. If so, counselors help individuals to understand blindness and to raise personal expectations and aspirations. This process often leads to employment goals for individuals who otherwise would not have believed that they could be successful in the job market as a blind or visually impaired person.

Our field supervisors had develop partnership with their local businesses and local governments to educate them about our agency and the capability of the blind in the workforce. NCBVI has also developed workshops for clients that give a jump–start toward competitive employment. They also serve to educate business people about the features and benefits involved with hiring blind job candidates, the capabilities of blind individuals, and technology related to blind persons in the workplace. These events have been highly effective in the short term and are expected to garner additional benefits over time.

On November 2018, NCBVI entered into a contract under the Randolph-Sheppard program with Offutt Air Base, Strategic Command (USSTRATCOM) to run a federal cafeteria and also 26 break rooms for vending machines; which started to operate in July 2019. Furthermore, in May 2019, Nebraska adopted a State law that strengthens the Nebraska Business Enterprises and thus got more state buildings for vending machines, including 13 new locations with the Nebraska Department of Corrections. In addition, we filed for arbitration against the Veterans Administration to get vending permits for a couple of new buildings, one in Omaha which will be built in 2020 and the other for Lincoln which will be built in 2021. The Veterans Administration eventually agreed to give us the permits and we should be running those two locations as well. Blind vendors will be able to make more money as a result of NCBVI's efforts to expand the NBE program. The upturn in the national economy over the past couple of years has created a more favorable labor market; however, there are still pressures which make getting a job more difficult for individuals who are blind or visually impaired. It is hoped that the overall economic situation in Nebraska and across the country will continue to improve during 2020.

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

Evaluation of Program Effectiveness.

Every year, NCBVI evaluates the effectiveness of its vocational rehabilitation program in several different ways; using data and input from Rehabilitation Services Administration (RSA), employers, consumers and the general public, staff members, the Client Assistance Program, and private or other public entities with whom the agency collaborates. Most important, service recipients are asked for their evaluation of services provided at several stages of their program.

The needs of Nebraskans who are blind or have visual impairments are identified on a statewide basis through public forums and meetings, surveys of clients after completion of Center training, after case closure, and changes at statuses 18 and 20. There is ongoing communication with the NCBVI Governing Board of Commissioners (four of five of whom are blind) and the agency's accessible website. Work continues with the resultant feedback, to best address identified needs and to modify procedures for the future. The public forums held throughout the year continue to confirm and reinforce findings of that formalized needs assessment.

Statewide Needs Assessment.

In 2018, NCBVI initiated a contract for a statewide needs assessment with Louisiana Tech University-Professional Development and Research Institute on Blindness Research and Training LLC. The assessment includes surveys of blind clients who were closed either in status 26 or 28, members of NCBVI staff, and employers who have had experience with NCBVI staff and clients. Semi–structured interviews were conducted with other key informants. In addition, existing data from various sources were analyzed, such as the RSA–911 data for NCBVI, American Community Survey data, and Bureau of Labor Statistics labor and economic forecasts. Some of the more important research findings of the statewide needs assessment issued in PY 2018 were as follows:

Individuals with the most significant disabilities, including their need for supported employment services

Regarding the provision of services to individuals with the most significant disabilities, the Nebraska Commission for the Blind and Visually Impaired is tasked with the mission to serve individuals with legal blindness and significant visual impairment, which meets the definition of the Rehabilitation Services Administration's definition of "most significantly disabled." To that end, the data show that most consumers served by NCBVI (54%) have a primary disability of legal blindness, with the remainder being visually impaired. Regarding the satisfaction with the services

that were provided, 80% of consumers surveyed stated being satisfied or very satisfied with the services being provided. According to the chart of services that were provided to consumers, it appears that most of the indicated services were used by all consumers. Of the consumers surveyed, 59% were employed full or part time or were self-employed, 47% had access to medical and dental insurance, and 52% had access to retirement. Of those who were employed, 79% said they were satisfied or very satisfied with their job, and these individuals reported an average monthly salary over $2,000. Of those who were unemployed, lack of transportation was cited as the single biggest factor in their inability to find or keep work.

In the specific area of supported employment, no consumers reported this as an area of need or had advice for the Commission in this area. Staff cited supported employment as an area that needed additional focus and improvement on par with many other services, but not better or worse than many other services offered. Key informants did cite supported employment as an area that was very important and needed improvement. A couple of comments from key informants in supported employment were:

- Having significant additional disabilities means that support will always be needed at some level for success in employment. That initial one on one support can be phased out to minimal assistance of coworkers if training is thorough and over a lengthy period. Supported employment encourages communication and understanding.
- Many students learn by repetition. If a job coach was available to demonstrate and observe, students would find more success because it would become their routine.

Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program

Across the RSA data reports, consumer, staff, pre-ETS and employer surveys, the ethnic diversity of the consumers served is on par with the demographics for the state of Nebraska. The RSA closure data 85.7% of consumers were of white or Caucasian origin, another 14.2% reported being African American, while Asian and Native American were less than one percent. Across these categories, 4.7% reported being of Hispanic. According to the consumer survey, which was entirely voluntary, the ethnic composition was 45 individuals who were white or Caucasian (83.33%), three were African American (5.56%), two were Hispanic or Latino (3.7%), one Native American (1.85%) and three who preferred not to answer (5.56%). These data are similar to the population data for Nebraska and so the rates of service seem to be on par.

When staff were asked about their effectiveness in working with underserved populations, many felt that the needs of this group are the same as the needs for all other consumers; however, they felt that the Native American population, recent African immigrants, non-English speaking persons and the older blind were particularly vulnerable and needed additional support. When staff were asked what the Commission could do better to meet this need, the largest consensus revolved around the need for additional staff training on serving these populations.

Individuals with disabilities served through other components of the statewide workforce development system

When key informants were asked what the Commission could do more of to increase their presence or use of other statewide Workforce components, they stated:

- Host a program for employers, create a video or pamphlet of blind people of Nebraska performing their jobs independently or with accommodations;
- Partnerships with Region V and other agencies. Try to be respectful of the complicated relationships between all the agencies;
- transportation especially in rural areas.

Youth with disabilities, and students with disabilities, including their need for pre-employment transition services

NCBVI maintains an active database of all consumers being served, including those of Pre-Employment Transition Service (Pre-ETS) age. In PY 2018 NCBVI had 144 youth on its Pre-ETS caseload, who were an average of 16.44 years of age (SD=2.06), ranging from 12.58 to 21.22 years. These youth included 70 females (48.61%) and 73 males (50.69%). All these youth had an active service plan, and NCBVI also reported on 100 youth who had a Pre-ETS service plan but are no longer in that status. Of those youth, 48% had obtained a rehabilitation outcome.

As part of this comprehensive statewide needs assessment, two specific surveys were conducted to determine the extent to which NCBVI was meeting the needs of this population, one on the pre-ETS youth themselves and the second of key informants. On the Pre-ETS service, the sample consisted of 19 youth who reported an average age of 18.05 years (SD=3.26), ranging from 15 to 26 years. These youth were 13 females (65.00%) and seven males (35.00%), who were 16 White or Caucasian (80.00%), two Asian American, Asian (10.00%) and two Hispanic, Latino (including Puerto Rican) (10.00%). This group mostly had visual acuity of legal blindness or less, as follows: 20/200 or better (n=10, 62.50%); 20/200-20/400 (n=2, 12.50%), 20/400-20/800 (n=11, 6.25%), 20/800 or worse, but could count fingers (n=2, 12.50%), totally blind (n=1, 6.25%). All youth reported having no additional disabilities. When asked about their satisfaction with services provided, the vast majority (85%) said they were satisfied. Yet, individual comments indicate areas of need that youth or their parents felt needed to be addressed.

The Key Informants survey consisted entirely of parents, teachers or special educators for youth. A summary of the major themes noted by key informants related to the existing need were:

- help with transition into adulthood.
- Services in rural areas
- I think there is a gap for services for kids with multiple special needs. Our son is blind (ROP Stage V & has Autism).
- transition and inclusion with their typical peers

In summary, the Nebraska Commission for the Blind and Visually Impaired has demonstrated a long and strong track record of effectively serving the blind and visually impaired residents of Nebraska. The number of consumers served has increased faster than the population would indicate, the numbers closed with employment outcomes has increased, and the provision of services to transition age youth is on par. Nevertheless, the data demonstrate continued need for staff training, especially in the areas of serving underserved populations, increased programming for transition-age youth, and increased focus on utilizing other areas of the workforce to help in the rehabilitation process. All of these data are reported in detail in the subsequent sections.

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

The primary goal for the SE Program is to develop supported employment opportunities for persons who experience a significant secondary disability (i.e., developmental disability, acquired brain injury, mental illness, or other significant disability limiting a person's ability to maintain competitive employment without ongoing support).

An agreement with the Nebraska Health and Human Services System provides the expertise and resources, including ongoing support, to develop and sustain individualized services. Each individual with a developmental disability has a case manager service coordinator, employed by the Nebraska Health and Human Services, Division of Developmental Disabilities (NHHS–DDD). The case service coordinator is responsible for developing an Individual Service Plan (ISP) for each client. When supported employment services are involved, NCBVI provides incentive payments at specific intervals (start of job search, start of employment, stabilization, maintenance, and start of long-term support.). This arrangement is in accordance with the "milestones" model used by Nebraska VR General to serve mutual clients interested in supported employment services shared with NDHHS–DDD.

Blind and visually impaired individuals with mental health issues, acquired brain injury, or other significant disabilities with onset of disability occurring after the age of 21 may also be candidates for SE services, and NCBVI is exploring ways to expand SE opportunities with these individuals through partnerships with relevant state agencies and non-profit SE service providers.

NCBVI works to enhance the potential to achieve employment outcomes in cases that often require maximizing resources and creativity. SE funds are utilized for training of clients who are Deaf–Blind or have other multiple disabilities. As appropriate, some clients are referred to the Helen Keller National Center (HKNC) for intensive training, not available in Nebraska. In recent years, there have been more Deaf–Blind individuals who have personal goals to become employed, who qualify for Supported Employment and for whom Supported Employment is indicated. In addition to the actual job coaching and ongoing supports, it is crucial for such individuals to enhance their capabilities for productive lives.

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

As outreach efforts are made to behavioral health agencies, resistance has been encountered to working with NCBVI. We believe that this is due in part to a general lack of understanding about NCBVI being the entity responsible for funding Supported Employment services for the blind. That is, that NCBVI is the same as Nebraska VR General in this regard. We believe that ignorance and lack of information about blindness also contributes to the hesitation experienced by other human service professionals unfamiliar with blind people. NCBVI field staff continue doing outreach work with other state agencies; as well as bringing health professionals to tour our Training Center and anticipate that this will lead to more interaction between our two agencies. To that end, efforts to educate behavioral health and other human service professionals will continue.

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

Analyses of performance accountability indicators under section 116 of WIOA have started to be collected based on quarters after closure. Highlights of data so far include: For PY 2018, we reported 113 measurable skill gains. In Q1 of PY 2019 we had 48 clients who had the same employer in the 2nd and 4th quarter after exit. Also, according to our Statewide Needs Assessment survey results regarding current employment situation, 16 were employed full time (27.12%), nine were employed part time (15.25%), ten were self-employed or independent contractors (16.95%), six were college or vocational students (10.17%), one was retired (1.69%), 16 were unemployed (27.12%), and one was volunteering part or full time (1.69%). For those who reported some level of employment, when asked how many years they had been at their current job, 34 individuals responded, stating an average of 5.41 years (SD=5.86), ranging from three months up to 28 years.

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

In PY 2018, NCBVI utilized I&E funds ($28,999) to pay for maintenance and update for AWARE, the client data management system produced by Alliance Enterprises. NCBVI also has a contract for PY 2021 ($145,040) with Alliance Enterprises to expand the AWARE system to include a financial interface so all the client's expenditures can be track with all the client's services.

q. Quality, Scope, and Extent of Supported Employment Services

Include the following:

1. *The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities*

Supported Employment (SE) is an employment option available to individuals with the most significant disabilities receiving services from NCBVI. An individual with the most significant disability is defined in rule (Title 192 Nebraska Administrative Code, Chapter 1) as an individual with a severe visual impairment or combination of visual, physical, or mental impairments which profoundly limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and an individual whose vocational rehabilitation can be expected to require extensive or intensive SE services.

NCBVI provides financial support of SE services using Title IV Subtitle B funds only if the placement is expected to meet the following conditions:

- The placement is community–based.
- The consumer is integrated into the workforce with other non–disabled individuals.
- The consumer earns at least minimum wage.
- The need for ongoing support is expected to continue indefinitely.

NCBVI works in partnership with the Department of Health and Human Services–Division of Developmental Disabilities (NDHHS–DDD) in the provision of SE services to blind and visually impaired individuals with developmental disabilities. Each individual with a developmental disability has a case service coordinator, employed by NDHHS-DDD. The case service coordinator is responsible for developing an Individualized Service Plan (ISP) for each client. When supported employment services are involved, NCBVI provides incentive payments at specific intervals (start of job search, start of employment, stabilization, maintenance, and start of long-term support.). This arrangement is in accordance with the "milestones" model used by Nebraska VR General to serve mutual SE clients shared with NDHHS–DDD.

Collaborative working relationships with state agencies and service providers are currently being explored to extend SE service opportunities to blind and visually impaired consumers with acquired brain injury, mental health conditions, autism, or other significant secondary disabilities. These agencies or service providers include the Nebraska Department of Behavioral Health, the Nebraska Mental Health Association, and Autism Center of Nebraska.

A small number of blind and visually impaired consumers with significant, non–developmental secondary disabilities occurring after age 21 might benefit from SE services. Generally, however, if the individual has a secondary disability other than a significant behavioral health condition or autism, there may not be a source of ongoing financial support for SE services extending beyond the time allowed for NCBVI support. In such cases, the Deputy Director of Services and the immediate supervisor of field services works with the NCBVI Counselor involved to identify possible resources for the ongoing support, such as developing a PASS (Plan to Achieve Self Sufficiency) or personal resources. The Deputy Director also provides statewide training and information to NCBVI personnel regarding the SE program.

NCBVI has service contracts with a number of providers in the Nebraska Developmental Disabilities system and with private providers of job coaching and related services. Contracts are developed on behalf of individuals with the most significant disabilities with both private and public providers who are actively seeking suitable work placements for them in integrated settings. We expect to provide SE services to approximately 80 clients in PY 2020.

2. The timing of transition to extended services

NCBVI Supported Employment clients are transitioned to extended services provided by other public agencies, non-profit organizations, employers, natural supports or other entities. Extended services can be funded to youth with the most significant disabilities for up to 48 months or until the client turns 25. The transition to extended services is based upon a) substantial progress made toward hours per week goal in the IPE, b) the client is stabilized on the job, and c) that extended services will be available and provided without a break in services.

Vocational Rehabilitation (Blind) Certifications

States must provide written and signed certifications that:

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

Nebraska Commission for the Blind and Visually Impaired

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

Nebraska Commission for the Blind and Visually Impaired

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

Carlos Serván

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

Executive 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
[14] Public Law 113-128.
[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.
[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.
[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.
[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.
[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.
[20] Applicable regulations, in part, include the citations in footnote 6.

Certification Signature

Signatory information	*Enter Signatory information in this column*
Name of Signatory	Carlos Serván
Title of Signatory	Executive Director
Date Signed	March 3, 2020

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:

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	

The State Plan must include	*Include*
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 designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	Yes
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	No
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	
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 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	

The State Plan must include	*Include*
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 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 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 Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving

Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains	14.0%	26.0%	15.0%	27.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

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

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

Temporary Assistance for Needy Families (TANF)

a. Conduct a program designed to serve all political subdivisions in the State

Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act)

Nebraska will continue to serve families who are Nebraska residents and:

- Are composed of either one or two parents; or
- Specified relatives, conservator, or guardian; and
- Who are expecting their first child to be born within the next 90 days; or
- Who care for children under the age of 18; or
- Up to age 19 if still in secondary school or participating in Employment First after dropping out of school; and
- Whose family's income and resources meet the current means test. Nebraska will operate a statewide program which provides temporary financial assistance for needy families with minor children and a mandatory work program known as the Employment First Program.

Eligibility for TANF

Nebraska's TANF cash assistance program is called Aid to Dependent Children (ADC). Eligibility is limited to needy families with dependent children or parent(s) with an unborn child in the final trimester. A needy family is defined as a family consisting of children who are living in the home of a relative, guardian, or conservator, unless removed from that home by judicial determination and whose income and resources are below the standards which are applied on a statewide basis.

Usually the child shares the same household with the parent, relative, guardian or conservator. However, a home is considered to exist as long as the parent or relative exercise responsibility for the care and control of the child, even though circumstances may require the temporary absence of either from the customary family setting. Allowable absences include:

1. A child receiving medical care or education which requires the child to live away from the home.
2. A child out of the home for a visit not to exceed three months.
3. Emergency situations that deprive the child of a parent, relative, guardian, or conservator's care (may not continue beyond three months except in case of extended hospitalization).

If the child is living with a relative, the relative must be a father, mother, grandfather, grandmother, brother, sister, stepfather, stepmother, stepbrother, stepsister, uncle, aunt, first cousin, second cousin, nephew, or niece. These relatives may be half blood, related by adoption, or from a preceding generation. A child may also live with the spouse of any persons previously named even after death or divorce has terminated the marriage. The child may also live with a court appointed guardian or conservator.

The needs of the parent(s), needy caretaker relative, guardian or conservator may be included in the ADC financial payment. To be eligible they shall:

1. Assign support rights to DHHS;
2. Cooperate with the Child Support Enforcement Unit;
3. Live with the child in a place of residence they maintain;
4. Be in need, as determined by assistance requirements and standards;
5. Cooperate in developing and completing a Self–Sufficiency Contract;
6. Not be eligible for the Aid to the Aged, Blind and Disabled (AABD) medical assistance program.

If there is more than one child in the household of a non–relative, all children for whom assistance is requested must be included in a single grant unit and budgeted accordingly. Deprivation of parental support or care is not an eligibility requirement. Unmarried parents living together as a family shall be considered a family unit when paternity for the child(ren) has been acknowledged or established. When unmarried parents are living as a family and one parent is ineligible, the ineligible parent and his/her child(ren) are not included in the ADC unit. If otherwise financially eligible, the other parent and his/her children may continue to receive ADC cash assistance. Eligibility for ADC cash assistance must be redetermined every six months. A family will be eligible for financial assistance and services if:

1. The family's countable income is under the standards in effect on July 1, 2013, adjusted biennially using the Consumer Price Index (CPI) for the previous two years; and
2. Countable resources do not exceed $4,000 for a single individual and $6,000 for two or more.

Any person convicted in federal or state court of having fraudulently misrepresented his/her residence in order to obtain assistance in two or more states is ineligible for ADC cash assistance for 10 years from the date of conviction.

An individual is ineligible for ADC cash assistance during any period in which the individual is:

1. Fleeing to avoid prosecution or custody or confinement after conviction for a crime or attempt to commit a crime that is a felony under the law of the place from which the individual is fleeing; or
2. Violating a condition of federal or state probation or parole.

An individual who commits any offense after August 22, 1996, which is classified as a felony and which has as an element the possession, use, or distribution of a controlled substance and is convicted under federal or state law after August 22, 1996, is permanently ineligible to be included in the ADC cash assistance unit.

As a condition of eligibility for ADC cash assistance, a client determined to be a work–eligible individual and subject to Employment First participation must complete his/her Employment First Self–Sufficiency Contract before the family can be determined eligible to receive ADC cash assistance. If a client does not cooperate in developing and completing an Employment First Self–Sufficiency Contract, the family is ineligible for ADC cash assistance.

Benefits

Effective September 1, 2015 the maximum amount of ADC cash assistance provided will be fifty-five percent (55%) of the ADC Standard of Need based on the number of eligible members in the unit. ADC cash assistance eligibility is determined in two steps, the first step is determining initial eligibility during the application process. If the unit is found eligible during step one, the second step is determining the units grant amount or ongoing grant eligibility. Once a unit is found eligible during step one, they are not again subjected to step one unless a financially responsible adult is being added to the unit.

1. Determining eligibility during the initial application process, or, when adding a financially responsible individual to an existing ADC unit, consists of the following steps:
    a. Calculate total gross earned income;
    b. Subtract 20 percent of total gross earned income;
    c. Subtract child care expense paid out-of-pocket;
    d. The result after step C is the net (countable) earned income.
    e. Compare the result of step D to the appropriate standard of need;
    f. If the result of step D is less than the appropriate standard of need, proceed to #2. If the result of step D is greater than or equal to the standard of need, proceed to step G.
    g. If during the initial application process, deny the application. If when adding a financially responsible individual to an existing ADC unit, determine eligibility for transitional benefits.
2. Determining ongoing eligibility will consist of the following steps:
    a. Calculate total gross earned income;
    b. Subtract 50 percent of total gross earned income;
    c. Subtract child care expense paid out-of-pocket;
    d. The result of step C is the net (countable) earned income.
    e. Subtract the net (countable) earned income from the appropriate Standard of Need;
    f. Compare the result of step E to the appropriate payment standard and show lower amount;
    g. Subtract unearned income from the amount shown in step F;
    h. The result of step G is the amount of the grant.

ADC cash assistance is time limited for families that include an adult or minor parent who meets the federal definition of a work–eligible individual. Families subject to the time limit may receive an ADC cash payment for which they are eligible for a total of 60 months in a lifetime. The 60–month lifetime limit begins with the first month the family is determined to be eligible for and receives ADC cash assistance.

Childcare assistance may be available at no cost to families receiving ADC cash assistance or whose gross earned and unearned income is at or below 100 percent of the Federal Poverty Level. Families whose incomes are above the current income standard for the full Child Care Subsidy program may be eligible for a partial subsidy if their gross earned and unearned income is at or below 185 percent of the Federal Poverty Level. Families must show a need for receiving Child Care Subsidy, such as, but not limited to; job search, employment, education, and training, incapacitated parent, and need to obtain medical care.

Transitional benefits

An ADC case may receive up to five transitional cash payments, each payment being equal to one fifth of the ADC Payment Standard for the family's size at the time the family becomes ineligible for an ADC cash payment if:

1. The unit lost eligibility for an ADC cash payment because of increased earnings or increased hours of employment of the parent or needy caretaker relative or guardian or conservator.
2. The unit meets the requirements to qualify for Transitional Medical Assistance.
3. The unit must have lost eligibility for an ADC cash payment in the month immediately preceding the first month of eligibility for the transitional cash payment.
4. In order to continue to receive transitional cash payments for the full five–month period, the family must meet the following requirements:
    a. The family's earned income cannot exceed 185 percent of the Federal Poverty Level for the family's size;
    b. The parent or needy caretaker relative or guardian or conservator must be employed;
    c. The family continues to reside in the State of Nebraska;
    d. The family must continue to include a dependent child; and
    e. The family must remain ineligible to receive an ADC cash payment.

Transitional cash payments will be funded with state dollars only. The state general funds used for transitional cash payments will apply towards Nebraska's Maintenance–of–Effort requirement. This additional cash benefit was created effective October 1, 2007.

A family whose income upon redetermination exceeds 185 percent of the Federal Poverty Level becomes eligible for Transitional Child Care. A family whose income exceeds 130 percent of the Federal Poverty Level may receive Transitional Child Care until the family's income exceeds 185 percent of the State Median Income during the eligibility period or 185 percent of the Federal Poverty Level at redetermination; If the income of a family receiving Transitional Child Care falls to or below 130 percent of the Federal Poverty Level, Transitional Child Care ends and the Department will redetermine the family's eligibility for other types of Child Care Subsidy.

Employment First

ORIENTATION ASSESSMENT/SELF-SUFFICIENCY CONTRACT. The orientation is done as an introduction to the Employment First program and the comprehensive assets assessment. The orientation highlights the responsibilities that the client will be expected to fulfill if s/he becomes eligible for ADC cash assistance. The orientation also provides the participant with detailed information on all Employment First requirements, program expectations, participation options, services, and time limits. An assessment will be completed with each participant. The purpose of the assessment is to gather and organize information about the participant's skills, aptitudes, strengths, interests, goals, prior work experience, family circumstances and employability. The assessment is an ongoing process. Reassessment occurs when a participant's circumstances change, when s/he is not able to continue forward movement in the activities included in his/her Self-Sufficiency Contract, or at any time the case manager and/or the participant determines it is necessary.

Based on the results of the assessment, an individualized Self-Sufficiency Contract, which incorporates a detailed Service Plan, will be developed. The Contract will stress urgent action toward economic independence. It will outline and define both DHHS' responsibility and the family's responsibility. The Service Plan will be used as a flexible tool. If the participant is not achieving progress in his/her Contract, it will be evaluated and changed accordingly.

Supportive Services

Supportive Services will be provided to the extent determined necessary to permit the individual to participate in any Employment First approved work activity, including the administrative process of orientation, assessment, self-sufficiency planning, and Self-Sufficiency Contract development, if no other source is available. Case management and necessary supportive services may be provided for the duration of the client's participation in all Employment First approved work activities and, if needed, after the loss of eligibility for ADC cash assistance due to earned income, and if the individual was either cooperating with or participating in Employment First at the time.

1. Extended Employment First Supportive Services can be provided for up to three months for all approved work activities included in his/her Self-Sufficiency Contract; and
2. Transitional Employment First Supportive Services can be provided for up to six months if the Supportive Services are determined as necessary and critical for maintaining and/or retaining their employment.

Supportive Services include the following:

- Clothing. The purchase of clothing that is necessary for the individual to effectively participate in any of his or her approved component activities as well as for employment may be approved.
- Expenses for Education and Training. The participant must apply for student financial aid before Job Skills Training, Vocational Training or Post-Secondary Education can be approved and included in the Self-Sufficiency Contract, unless the program is not eligible for student financial aid or the participant has other financial resources available to pay for the cost of training.
  1. Certification Programs. Expenses related to training programs that are not covered by student financial aid can be considered if there is no other source of payment.
  2. Adult Education Programs. The registration fee for all approved adult education programs may be authorized Employment Expenses. Expenses necessary and required for employment, such as uniforms, special clothing, or tools, may be authorized. There must be verification from the employer that the items required are required for employment. Transportation expenses may be provided until the participant receives their first full pay check from their job. Expenses related to the start-up or development of a business are not allowed.
- Medical Services. Employment-related medical services not covered by Medicaid may be authorized if they are necessary for the client to participate in Employment First activities or accept employment. The participant must have cooperated to establish Medicaid eligibility. Medical services are authorized at Medicaid rates.
- Relocation. Expenses related to relocation may be authorized if necessary for the participant to accept employment or participate in an education or training activity. In order to have such expenses authorized it must not be feasible for the participant to commute on a daily basis.
- Transportation. The Department may authorize payment for transportation to enable a participant to participate in any Employment First component. Bus tokens or tickets, commercial transportation, gasoline vouchers, car repairs, and relocation assistance are some examples of transportation services that can be provided. Public transportation must be used when available.

- Vehicle Repairs. Allowable repairs are those that are necessary for the vehicle to be in safe and reliable operating condition. Cosmetic repairs cannot be authorized. Repairs cannot be authorized if the cost of all repairs during a 12 month period exceeds the value of the vehicle.
  1. Vehicle Purchase. The purchase of an automobile is allowed for participants who have been gained permanent employment for 30 or more hours per week and no other transportation is available. There must be verification that the employment is a permanent position and the participant will be working 30 or more hours per week. There must be documentation that the participant has a valid driver's license. The purchase price is limited to $2,000.
  2. Vehicle loan payment. Car payments can be authorized one time in a 12 month period if the participant has a notice of repossession and the payment will resolve the emergency
  3. Commercial Transportation. Commercial transportation can only be authorized for up to four weeks in a 12 month period.
  4. Fuel and Oil. Fuel can be provided for transportation to and from the individual's home and the approved activity site. This includes transporting children to and from their child care provider or school if child care transportation by the child care provider or school is not available. There must be documentation that the participant has a valid driver's license, and current insurance and registration for the vehicle being used. An unlicensed participant may receive a gas voucher if they are going to use it as a contribution to a car pool or to someone else who is providing them transportation for Employment First purposes. Fuel should not be authorized for participants engaged in AmeriCorps or Federal work study because stipends from these programs are intended to cover transportation expenses.
  5. Vehicle Registration. Up to $500 of the cost of registering a participant's vehicle is allowed if the vehicle is required for participation. The cost of specialty license plates must not be authorized. There must be documentation that the participant has a valid driver's license and insurance.
  6. Insurance. Payment of vehicle insurance is limited to a one-time three month premium for basic liability coverage. Full coverage is allowed if the vehicle has a lien on it and the lender requires full coverage. The participant must be the owner of the vehicle.
  7. Driver's License. The cost of reinstating a driver's license is allowed unless the lost was due to driving while intoxicated or under the influence of drugs.
  8. Exempt Public Transportation. Exempt Public Transportation must be utilized prior to all other Transportation if available and appropriate for the participant's circumstances.

Safety and in-home services

DHHS will use TANF funds to support an array services to assist needy families with children so that children can be cared for in their own homes by DHHS, Division of Children and Family Services (CFS) staff. The services provided meet the first and fourth statutory purposes of TANF (as specified at §260.20(a) and (d) of this chapter):

The eligibility criteria will be needs based as indicated by the family's program eligibility status for Aid to Dependent Children (ADC), Supplemental Nutrition Assistance Program (SNAP), SSI or Medicaid. Medicaid eligibility will be based on parent income and not state ward status of an identified child.

The target population is identified through the assessment of maltreatment reports of abuse or neglect by CFS staff. The target population is families whose child or children (ages 0 through 18) are involved in a proceeding in the juvenile court system and placed in the custody of DHHS (court involved) or whose families are in need of support services to safely care for their children in their own home (non-court involved).

Nebraska uses Structured Decision Making (SDM) for the assessment of reports of maltreatment. SDM is a set of evidence based assessment tools utilized to provide structure for gathering information at critical case management decision points. SDM increases the consistency and validity of decisions related to child safety, targeting resources to families at high risk of future maltreatment, supporting decisions for using out-of-home care and determining case closure. SDM also can be used to aggregate assessment and decision data to inform agency monitoring, planning and budgeting. The goals of the model are to reduce subsequent harm to children including re-referral, repeat maltreatment (in-home and out-of-home), and to reduce the time to permanency for children served by the DCFS.

The array of services include:

1. In-Home Safety Service is a rapid response, home-based intervention service delivered by trained professionals to manage identified safety threats in order to safely maintain the child in the family home. Trained professionals shall intervene if safety of the child(ren) is compromised. Trained professionals shall provide training, modeling, and coaching to the parent or caretaker when necessary to facilitate the child remaining safely placed in the family home.
2. Intensive Family Preservation (IFP) Service is defined as intensive crisis intervention, therapeutic intervention and life skills education for the target population identified below provided in the home or at a location identified in the service referral. This service is designed to strengthen the family system, improve family functioning, increase access to community resources, and assist in accessing informal and formal supports to preserve the family unit. This service is designed to create sustainable change in the family unit by focusing on interventions that build on family strengths in order to eliminate safety threats and/or reduce the risk of child maltreatment. This service must be delivered in the family home or their community, available 24 hours a day, 7 days a week, including holidays and weekends. This service must include multiple face-to-face direct contacts and indirect contacts (e.g. telephone calls, e-mail) with the family each week.
3. Family Support Service is defined as the provision of face to face assistance, coaching, teaching, role modeling, and the supervision of visits when applicable by a trained professional in the family home or community based setting. Family Support Service promotes family well-being and enhances the protective factors i.e., knowledge of parenting and child development, resilience, social connections, concrete supports, and social and emotional competence.
4. Agency Supported Respite Care is defined as the temporary care and supervision of youth referred by DHHS that is provided in a licensed foster home during an urgent or pre-planned situation. The Contractor shall communicate all known information about the child to the respite care family. The Contractor will also provide input to planning processes i.e. Family Team Meetings, Independent Living Plans and preparation of Case Plans and Court Reports when requested by DHHS. The Contractor will provide any information requested by DHHS necessary to complete reports required by any applicable Federal or State law and regulation. The Contractor shall be in compliance with all DHHS policy and regulation, to include regulation and licensure established by the Division of Public Health. The Contractor shall be responsible for transporting children in respite care to their home school, activities, and services that are located within a 25-mile radius from the foster care home. Activities and services are expected to include visits with the child's family members, behavioral health appointments, medical appointments, and extra-curricular activities
5. Drug Testing and Lab Confirmation Service is defined as a point of collection test by a trained employee in which specimens such as urine, saliva, and breath are used to determine a positive or negative drug test result. Collection of a urine specimen will be conducted through line of sight observation of the client by a trained employee of the same gender. Drug testing includes the collection of a sweat specimen obtained

through the use of a patch. A refusal by the client is defined as the client choosing not to provide a specimen to the Contractor at a designated time and place. All refusals must be reported to the DHHS case manager or supervisor by the end of the next business day, unless otherwise noted in the service referral. A no show by the client is defined as the client not being present to provide a specimen to the Contractor at the designated time and place. All no shows must be reported to the DHHS case manager or supervisor by the end of the next business day, unless otherwise noted in the service referral. Laboratory test confirmation is defined as screening the collected specimen by a laboratory to detect the presence of a specific drug(s) or substance(s) and the concentration of the drug(s) or substance(s) as identified and requested in the Service Referral. Laboratory test confirmation includes the written verification of the results. The Contractor's drug testing protocol and policy shall be consistent with the Substance Abuse and Mental Health Services Administration (SAMHSA). The Contractor's drug testing protocol, policy, and rates shall be submitted to each Service Area Contract Liaison where the service will be provided.

6. Family Peer Support services are time limited and designed for the caregiver of a youth with a severe emotional disturbance or substance use disorder, and who has experienced behavioral/emotional challenges in the home, school, and/or community. Services utilize a parent peer coaching model to facilitate system navigation, accessing community resources and other benefits, engaging with formal and informal supports to ensure that the elements of the family plan for the youth and family are planned for and progress towards goals and objectives occur. Services are designed to increase capacity and skills to prevent/stabilize crisis within the family, caregiver, or prevent out of home placement of the youth.

*Please note, a Federal Court has ruled it is unconstitutional to mandate drug test for Public Welfare individuals.

b. Require a parent or caretaker receiving assistance to engage in work

Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)

EMPLOYMENT FIRST PARTICIPATION Nebraska has adopted the federal definition of work–eligible individuals. All individuals who are defined as a work–eligible individual including parents and needy care-takers are required to participate in the Employment First Program.

Once a family applies for ADC cash assistance, all work–eligible individuals, unless they otherwise qualify for an exemption from Employment First, are referred to the Employment First program at the time of the intake interview. The work–eligible individual is required to complete an Employment First Self–Sufficiency Contract within eight days of the referral and immediately engage in approved work activities.

Dependent children age 15 or younger (including an emancipated minor) and dependent children age 16, 17, or 18 who are full–time students regularly attending an elementary or secondary school or a dependent child age 16 or 17 who is a full–time student and regularly attending college, are not required to participate in the Employment First program.

Definition of Work Eligible Individuals

Nebraska excludes from the definition of Work Eligible Individuals:

- A minor parent who is not a head-of-household
- A non-recipient parent of children receiving TANF/MOE who is ineligible to receive assistance due to immigration status;
- An individual receiving assistance under an approved Tribal TANF program.
- A non-recipient parent of children receiving TANF/MOE who is not receiving TANF benefits due to receipt of SSI or SSDI. Nebraska does not consider disabled parents receiving Social Security Disability Income or Supplemental Security Income to be 'work-eligible individuals' because they are not included in the TANF payment unit.
- A parent needed in the home to care for a disabled family member who is not attending school full-time.*

*Nebraska Policy states: "The need for such care must be supported by a signed statement from a licensed medical professional.

Disability of the family member

The disability of the family member being cared for should be evaluated periodically, depending on the diagnosis and prognosis for recovery in order to determine if the parent is still needed in the home to provide care." "The case manager must review the exempt status:

1. At the time of redetermination of eligibility for ADC;
2. When the case manager becomes aware of a change which may affect exempt status; or
3. Within 30 calendar days of a request by the client or another case manager to reconsider "mandatory" status."

Solely state–funded program for specified exemptions

Nebraska has implemented a solely-state funded program for families receiving ADC cash assistance where the adult or minor parent qualifies for one of the specified exemptions. To allow for more flexibility in serving these families, this program is not funded with federal TANF funds. Cash assistance provided to these families will be funded with state dollars only. The state general funds used for cash assistance for this program will not count toward Nebraska's TANF maintenance–of–effort requirement and therefore are not subject to any federal TANF requirements. This program was created effective October 1, 2006 This solely state–funded program allows Nebraska to exempt from the work participation requirements and federal time limits those families where the adult or minor parent is incapacitated with a medically determinable physical, mental or emotional impairment or who has significant barriers to participation in approved work activities. Nebraska will provide the services necessary to help these individuals overcome and/or remove the barriers preventing them from effectively engaging in approved work activities and attaining the maximum level of economic independence possible for their families through work.

The following individuals are exempt from participating in Employment First and are exempt from the state and federal time limit for the length of time they qualify for the exemption:

1. A person who: a. Has an illness or injury serious enough to temporarily prevent entry into employment or participating in another Employment First component activity for up to three months; Is incapacitated with a medically determinable physical or mental impairment which, by itself or in conjunction with age, prevents the individual from engaging in employment or participating in another Employment First component activity and which is expected to exist for a continuous period of at least three months.
2. A person age 65 or older.
3. A parent who is needed in the home on a continuous basis to provide care for a disabled family member living in the home who does not attend school on a full–time basis and no other appropriate member of the household is available to provide the needed care.
4. A victim of domestic violence and where participation in Employment First approved work activities would make it more difficult for the individual to escape violence, or unfairly penalize the individual, or would put the individual at risk of further domestic violence.
5. A single custodial parent who is unable to participate because s/he cannot obtain child care for his/her child age five or younger for one or more of the following reasons:
    a. Unavailability of appropriate child care within a reasonable distance from the client's home or work site;
    b. Unavailability or unsuitability of informal child care by a relative or under other arrangements; or
    c. Unavailability of appropriate and affordable formal childcare arrangements.

Two–parent families are allowed the same exemptions as are single–parent families, but will remain in the solely state–funded program for two–parent families. If both parents in a two–parent family qualify for an exemption, the family will be exempt from the state time limit for the length of time both parents qualify for an exemption.

c. Ensure that parents and caretakers receiving assistance engage in work

Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance

Work activities

Nebraska's approved work activities are:

1. Core activities:
2. Unsubsidized Employment;
3. Subsidized Private or Public Sector Employment;
4. Work Experience;
5. On-the-Job Training;
6. Job Search/Job Readiness;
7. Community Service;
8. Vocational Training;
9. Providing Child Care Services to an Individual Who is Participating in a Community Service Program; and
10. Post-Secondary Education.

Non-Core activities:

1. Job Skills Training Directly Related to Employment;
2. Education Directly Related to Employment; and
3. Satisfactory Attendance at Secondary School or in a Course of Study Leading to a Certificate of General Equivalence.

Sanctions

Non-cooperation with the program requirements will result in the following sanctions:

- ADC cash assistance will be reduced by $50 for each dependent child who fails to attend school if the student's parent has not taken reasonable steps to encourage the child to remain in school.
- Non-cooperation with Child Support Enforcement will result in a 25 percent reduction in the ADC cash payment and the removal of the sanctioned individual's needs from the medical unit.
- Refusal to apply for potential income will result in the suspension or closure of the ADC case.
- Failure of a needy caretaker relative, guardian, or conservator to participate in the Employment First program results in the removal of the individual's needs from the ADC unit. The sanction will last until the failure to participate ceases.
- Failure of a dependent child age 16, 17, or 18 to attend school without participating in any other Employment First approved work activity results in removal of the child's needs from the ADC unit. The sanction will last until the failure to participate ceases.
- If the parent(s) fails to participate in the Employment First program, the result is the loss of ADC cash assistance for the entire family. The length of this sanction is:
    1. The first sanction will last one month or until the failure to cooperate ceases, whichever is longer.
    2. The second sanction will last for three months or until the failure to cooperate ceases, whichever is longer.
    3. The third and subsequent sanctions will last for 12 months or until the failure to cooperate ceases, whichever is longer.

Documentation

1. Identifying work-eligible individuals - In the process of gathering data for the ACF-199 we first determine the adult's status in the TANF case. Work-eligible individuals are:
    a) An adult recipient of cash assistance from TANF or SSP-MOE funds.
    b) A minor parent recipient who is head-of-household
    c) Non Recipient parents with a reason of:
        - Child Support Sanction;
        - Convicted Drug Felon;
        - Third Party Medical Sanction;
        - Intentional Program Violation Sanction;
        - Fleeing Felon;
        - SSN Sanction; or
        - Misrepresenting Residency Sanction

We are assured of the accuracy of identifying work-eligible individuals because of the data entry requirements in our automated eligibility system. (N-Focus) The "new" categories of work-eligible individuals are identified in N-Focus as Financially Responsible within the TANF case. Compiling the data for the ACF-199 submission includes reading each case for the relationship between the adult(s) and children in the TANF case. When there are two adults, each with a parental relationship to the children, it is identified as a two-parent family with corresponding work participation requirements. If there is only one identified adult, or minor parent head-of-household, with a parent role to the children in the case, it will be included in the overall work participation data.

Nebraska has developed tools for use by case managers and workers to track and verify the actual hours of participation by work-eligible individuals. These tools will be required for use on a statewide basis and are included as an attachment to this plan. Our automated eligibility system only allows staff to enter participation hours for federally defined activities, thereby assuring we do not report non-countable activities.

Additionally, The Department has established a team of Economic Assistance Program Accuracy Specialists as part of the Research, Planning and Evaluation team that has responsibility for reading a select number of cash assistance cases each month to assure benefits are accurately determined. In addition, the TANF Policy Unit has five (5) designated staff who conduct reviews of the Employment First related TANF cases each month. These reviews monitor the actual case accuracy, as well as service plans, supportive services, and participation verification and documentation for each individual.

Our average number of reviews per month is 475 TANF related cases. TANF Policy Staff review an average of 330 cases each month to assure compliance with TANF Work Verification Procedures and Requirements. An additional 145 cases are reviewed by TANF Policy Staff each month to assure contracted case management meets Nebraska's expectations and requirements. We now have the capability for online management reports showing the results of these reviews and are able to identify policy areas where staff need to be provided with additional information. Conducting a random sample of approximately 4,300 TANF cases will provide results in which we can be 99% confident that the results are within 2% of what would be found if all the state's 5,732 cases were reviewed.

We continue to monitor case activity from the ACF-199 report. When areas of inaccuracy are identified, contact is made with eligibility staff and their supervisors. Our expectation is that identified cases will be corrected, and the worker and supervisor will develop a greater understanding of policy and system issues.

Second level reviews of TANF case reviews will be completed by a TANF Policy Staff person each month. Of the 475 cases reviewed monthly, a second-level review will be conducted on 15% of selected staff's work participation case reviews each month. Each month a management report is generated from our automated eligibility system that lists Employment first Cases where the individual is exempt from participation and the exemption exceeds the maximum number of months allowed by policy. These reports show cases by Service Area, Office, Supervisor, and Worker.

These reports are to be reviewed by Employment First Case Management Supervisors with the expectation that staff will follow through with processes necessary to insure accuracy of the work activity information. As supervisors review the monthly Case Activity reports, any miscalculation that resulted in incorrect entry will be reflected in the reports.

The State of Nebraska will maintain all pertinent findings produced through these internal control processes and can and will be made available for use by ACF and other auditors in their review of Nebraska's work participation verification system.

Each month the Employment First Case Manager calculates the verified hours of participation and enters that amount in the automated eligibility system. These hours are then read during the ACF-199 process and transmitted as Work Participation. The previously described case review processes compare the data in the Employment First case file with the data input into N-Focus to verify accuracy of the data. In addition, each month, following the run of data for the ACF-199 report, a listing of cases submitted is generated. This list shows the Work Activity, the number of hours submitted and the participation status for each adult or minor parent head of household. This report is reviewed on a monthly basis by policy staff and any inaccurate entry of data is noted at that time.

The monthly Work Participation report from the ACF-199 data is based on the complete caseload.

Emergency Assistance to Needy Families with Children (EA)

Nebraska's Emergency Assistance program provides financial assistance and/or services to or on behalf of a needy child(ren) and any other members of the household to meet needs that have been caused by an emergency situation when the needs cannot be met because of destitution. The program provides a means to deal with financial situations

that are threatening the health or wellbeing of an eligible child and family. Emergency Assistance benefits must be used to help return the family to a stable environment that they will be able to maintain. The Emergency Assistance program is funded with federal funds only. Emergency Assistance may be provided to a needy child and any other member of the household in which the child is living only if:

1. The child is age 18 or younger (a pregnant woman with no other children may be eligible);
2. The child is currently living with one or both parents, or is temporarily absent from their home and within six months before the month in which assistance is required, was living with a specified relative* or a legally appointed guardian or conservator** in a place of residence maintained as their own home;
3. Members of the household must be legally residing in the United States;
4. The household meets relevant income eligibility requirements. The family's gross monthly income must not exceed 185 percent of Nebraska's ADC Standard of Need for the family size; and e. The destitution or need did not arise because the child (if age 16 or older and not in school) or the relative responsible for support and care refused without good cause to accept employment or training for employment or quit a job without good cause. However, if the child or family member refused without good cause to accept employment or training for employment or quit a job without good cause, but the emergency was not caused by this action, the family is still eligible for EA.

* A specified relative is defined as a relative with whom a child must be living or have been living within six months prior to the month in which EA is requested. A specified relative includes a child's father, mother, grandfather, grandmother, brother, sister, stepfather, stepmother, stepbrother, stepsister, uncle, aunt, first cousin, second cousin, nephew or niece are specified relatives. These relatives may be half-blood relation, related by adoption, or from a preceding generation as denoted by prefixes of grand, great, great–great, or great–great–great. A child may also live with the spouse of any persons previously named even after the marriage has been terminated by death or divorce.

** Under Nebraska law, a guardian has the same powers, rights and duties that a parent has respecting his or her minor child and a conservator has all powers which he or she could exercise if not under a disability (Nebraska Revised Statutes §§30–2628 and 30–2637).

Supportive Services and Work Supports for Child Welfare Families

Supportive services and work supports may be approved to assist families with safely caring for their children in their own homes. Families must need the support in order to work or participate in activities such as job search, community service, education, or training. Services provided will meet the TANF Goal One, to provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; and TANF Goal Two, to end dependence of needy parents on government benefits by promoting job preparation, work and marriage by supporting parents job and career advancement activities Families must be at or below 200 percent of the Federal Poverty Level (FPL) to qualify for the program. Funding method is federal dollars only.

Nebraska SNAP Next Step

The SNAP Employment and Training (SNAP Next Step) Program helps SNAP participants gain skills, training, or work experience to increase their ability to obtain regular employment that leads to economic self-sufficiency. Additionally, the Employment and Training program offers a way to allow SNAP recipients to meet SNAP work requirements. Services provided will meet the TANF Goal Two: to end dependence of needy parents on government benefits by promoting job preparation, work and marriage by supporting parents job and career advancement activities. Eligible participants must be families with dependents under age 19 with a SNAP recipient enrolled in the Employment and Training program. Services are considered non-assistance by the agency. Funding method is federal dollars only.

d. Restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

All information regarding individuals and families will remain confidential and available only for the purposes of the effective administration of the program and to other federal or state agencies as appropriate. All employees are trained in the need to maintain the confidentiality of information. All DHHS staff must complete HIPAA and SSA

confidentiality training and all contractors must agree to and sign HIPAA Business Associates Agreements and SSA Access Agreements.

Access to DHHS' computer system N–FOCUS is defined by a security role that is attached to a person's ID, and access to information is defined and limited by job responsibilities. A personal logon ID cannot be issued until the individual completes a state developed orientation course. The orientation includes a review of data privacy and ethics as they pertain to client information.

All DHHS staff, contractors, temporary workers, and business partners are aware of the Information Technology (IT) Policies, Procedures, and Safeguards implemented by DHHS and understand their roles and responsibilities in insuring DHHS IT resources are secure and protected. There are two sections to the Security Awareness Training. The first section "Information Technology Computer User Security Awareness" must be completed by any individual who uses a DHHS computer. The second section "IRS Federal Tax Information Appropriate Use and Disclosure" must be completed by every DHHS staff person that accesses IRS Federal Tax Information in the N–FOCUS data system.

e. Goals and actions to prevent and reduce out-of-wedlock pregnancies

Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

Out of Wedlock Births

Nebraska reproductive health

Nebraska Family Council is the Federal Grantee administering the statewide Title X Family Planning Program. Title X delegate clinics provide reproductive health education and comprehensive medical services that are an integral part of prevention and good health. Nebraska Family Planning Council:

- Promotes responsible behavior, the well–being of families and healthy babies.
- Reduces mother and infant death, unintended pregnancies, child abuse and sexually transmitted diseases.
- Allows timing of pregnancies when couples are in the best position to care for new children.

Eleven delegate clinics provide services to people, both female and male, regardless of income, marital status, age, national origin, or residence.

Services at delegate sites are confidential and provided in a setting that preserves and protects the privacy and rights of each person. Medical services include:

- Physical exams
- Cervical cancer screening
- Breast cancer screening
- STD testing and treatment
- High blood pressure screening
- Anemia screening
- Pregnancy testing
- Contraceptive methods
- Referrals and links to community resources

Education services include:

- Reproductive and preventative health
- Self–breast and testicular exams
- Contraceptive methods
- STD/HIV risks
- Infertility information

NE Reproductive Health continues to manage a part of the Title V Maternal Child and Adolescent Health (MCH) block grant specific to Adolescent Reproductive Health. Reproductive Health also manages State funds made available to public health clinics for colposcopy training and equipment. Colposcopy is used to detect abnormal cells, cancer and HPV.

The purpose of the MCH Block Grant Adolescent Reproductive Health subawards is to engage adolescents to increase their utilization of reproductive health services.

The primary goals of increased utilization are to:

- increase adolescents' ability to make informed decisions about their reproductive health
- decrease STD/STI rates and
- decrease the number of unintended pregnancy

Jobs of America's Graduates (JAG)

Nebraska DHHS has an interagency agreement with the Nebraska Department of Labor (NDOL) to fund the Jobs for America's Graduates (JAG) program; This program is dedicated to supporting young people who face significant challenges to assist them in staying in school through graduation, pursue postsecondary education, and secure quality entry-level jobs leading to career advancement opportunities. Services provided will meet the TANF Goal Three: to prevent and reduce the incidence of out-of-wedlock pregnancies by providing intervention and improved life prospects for students who show evidence of failing, dropping out or engaging in negative behaviors that can lead to dependency, out-of-wedlock births, imprisonment, and/or other undesirable outcomes which may lead to the detriment and impoverishment of youth. Eligible young people for the Nebraska JAG program must have barriers, as defined by the JAG program that make them more at risk in graduating from high school, pursuing a post-secondary education and/or a successful addition to the labor force. Services are considered non-assistance by the agency. TANF funding method is federal dollars only.

Nebraska-Maternal, Infant, Early Childhood Home Visiting Program (N-MIECHV)

The Nebraska-Maternal, Infant, Early Childhood Home Visiting Program (N-MIECHV) supports pregnant or parenting families of children birth to age five who may struggle with significant life stressors, such as poverty, exposure to violence or substance abuse, teen parenting, or military families with one or both parents in service. Services provided will meet TANF Goal Three: to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies. Families must be at or below 250 percent of the Federal Poverty Level (FPL) to qualify for the program. Funding method is federal dollars only.

Abstinence Education

As a result of the Patient Protection and Affordable Care Act of 2010, P.L. 111–148, Nebraska is receiving federal funds to provide a state Abstinence Education Program for youth through community–based projects statewide as defined by Section 510(b)(2) of the Social Security Act. A state plan for implementing the program was approved December 20, 2010 by HHS, Administration for Children and Families, Family and Youth Services Bureau. The state plan can be found on the DHHS website at: http://dhhs.ne.gov/publichealth/Pages/lifespanhealth_adolescenthealth_abstinenceeducationprogram.aspx.

f. Education and training on the problem of statutory rape

Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

State Rape Education Program

Nebraska Revised Statutes 28–317 to 321, Crimes and Punishments, does not distinguish between genders. The State Rape Education Program serves all genders equally without distinction. The educational services provided are the same for both genders statewide. The program receives grant from the Center of Disease Control (CDC) which must be spent on rape prevention.

The Nebraska Law Enforcement Training Center, the Nebraska State Patrol, and the Omaha Police Department are the three entities responsible for providing training to Nebraska's law enforcement officials on the problem of statutory rape. In addition, DHHS contracts with the Nebraska Domestic Violence Sexual Assault Coalition to provide training and technical assistance to local rape crisis centers as well as local police departments upon request regarding statutory rape.

The Lindsay Ann Burke Act (Nebraska Revised State Statue 79-2,141) requires each school district to provide dating violence training to staff deemed appropriate by a school district's administration. The dating violence training shall include, but not be limited to, basic awareness of dating violence, warning signs of dating violence, and the school district's dating violence policy. The Nebraska Department of Education provides resources to schools to be utilized in their training including information on statutory rape.

g. Access to assistance

Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

Nebraska uses the US Bank ReliaCard for TANF benefits. The ReliaCard Visa is a prepaid debit card, offered to DHHS grant recipients, clients and individual service providers who wish to receive their benefits electronically. This No–Cost or Low–Cost payment method is a great alternative to paper checks and direct deposit because it is fast, secure, convenient and easy.

- Fast & Efficient – You won't have to wait for the mail to arrive and have no risk of lost or stolen checks. Your money is automatically deposited to your card account.
- Safe & Secure – No need to carry large amounts of cash. Cardholders can get cash from many retailers, over 1 million Visa/Plus branded Automated Teller Machines (ATMs) and any bank or credit union accepting Visa.
- Convenient – Over 20 million merchants nationwide and more internationally, accept the ReliaCard. It can be used to make purchases everywhere Visa debit cards are accepted, including grocery stores, gas stations and restaurants.
- Easy – No existing bank account, credit approval or minimum balance is required.

TANF EBT restrictions P. L. 112–96 (Middle Class Tax Relief and Job Creation Act of 2012)

Nebraska has reached agreement with U. S. Bank, the vendor for our electronic benefit card to restrict access to automated teller machines or point–of–sale devices in casinos, gaming establishments, liquor stores, and retail establishments which provide adult–oriented entertainment. The restrictions will be placed based on vendor codes for these establishments and thus recipients of assistance will be able to access their benefits at any teller machine or point–of–sale device at other locations. Nebraska recipients of TANF assistance are not charged fees for use of their electronic benefit cards at any device.

h. Ability to use or withdraw assistance with minimal fees or charges

Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

The ReliaCard Visa (Electronic Benefit Transfer card) is a No-Cost or Low-Cost payment method for DHHS TANF cash grant recipients and individual service providers. It is fast, secure, convenient, and efficient and most services are free. The TANF cash payment recipient receives a Fee Schedule listing the fees and surcharges when their ReliaCard is sent to them. The following services are free with the Nebraska ReliaCard: Online Customer Service Live Customer Service Representative; Automated Interactive Voice Response; Standard Card Replacement; Account Maintenance; Teller Cash Withdrawal; ATM Withdrawals at U.S. Bank or MoneyPass® ATM; 1st ATM use per month for non-U.S. Bank; or non-MoneyPass ATM Optional service to receive e-mail, text alert or mobile phone alert to notify account holder of deposit, address change, funds added, low balance and/or zero/negative balance. The following services have fees for the Nebraska ReliaCard: $1.00 Fee for Out-of-Network Withdrawal; $1.00 fee for International ATM Withdrawal; $2.00 Fee for Card to Bank Transfer; $15.00 Fee for Card Replacement Expedited; $1.00 Fee for Inactivity after 365 days.

i. Families moving from another State

Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

Nebraska will continue to serve families moving to Nebraska under the same program regulations as are applied to other Nebraska families.

j. Assistance to non-citizens

Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

Nebraska will continue to serve qualified aliens as defined in section 431 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as amended, under the same program regulations as are applied to other Nebraska families.

k. Criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment

Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

APPEALS/MEDIATION

Every applicant for or recipient of assistance or services provided through DHHS has the right to appeal to the Director of DHHS for a fair hearing on any action or inaction with regard to the assistance or services. The request for a fair hearing must be filed in writing within 90 days following the date the notice of adverse action is mailed. If an applicant wishes to appeal due to inaction, s/he must request a fair hearing within 90 days of the date the application was signed. Requests for a fair hearing filed within ten days following the date the notice of adverse action is mailed will stay the adverse action until a fair hearing decision is rendered.

Employment First participants have the right to independent mediation if the participant is unhappy with a case manager's action or inaction; or when DHHS has determined that the participant has not complied with the terms of the Self–Sufficiency Contract; or the participant contends that DHHS has not fulfilled its terms of the Self–Sufficiency Contract. The request for mediation must be requested within 90 days following the date the notice of adverse action is mailed. Requests for mediation requested within ten days following the date the notice of adverse action is mailed will stay the adverse action until a decision is reached through mediation. If the individual is unhappy with a case manager's action or inaction, the individual has 30 days from the date of the case manager's action or inaction or the date the individual became aware of the case manager's action or inaction to request mediation.

l. Assist individuals to train for, seek, and maintain employment

Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

1. *Providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or*
2. *In other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the state for which the state identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.*

Elder care

Nebraska assists Employment First participants to train for, seek, and maintain employment providing direct care in long–term care facilities, and in other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel.

To help communities address the growing need for personnel in the eldercare and healthcare fields, where possible, the Employment First program will partner with community organizations, schools and businesses in developing and funding community responsive customized training for certified nursing assistants (CNA) and certified medication aides (CMA). Nebraska promotes and funds CNA and CMA training, for which state and federal financial aid is not available. Job skills training and vocational training in eldercare and healthcare occupations are approved work activities under the Employment First program.

m. MOE-funded services

Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

Separate state program for specified exemptions

Nebraska has implemented a separate state program for single–parent families receiving ADC cash assistance where the adult or minor parent qualifies for one of the specified exemptions. ADC cash assistance provided to these families will be funded with state dollars only. The state general funds used to support this separate state program will apply towards Nebraska's Maintenance–of–Effort requirement. This program was created effective October 1, 2006.

The following individuals are exempt from participating in Employment First and are exempt from the state and federal time limit for the length of time they qualify for the exemption:

The following individuals are exempt from participating in Employment First and are exempt from the state and federal time limit for the length of time they qualify for the exemption:

1. A pregnant woman beginning the first of the month before the month of the mother's due date.
2. A parent or needy caretaker relative, guardian or conservator of a child under the age of 12 weeks. This exemption can be extended if a written statement from the attending physician states that the parent requires additional post-partum recovery time, or special medical conditions of the child require the presence of at least one parent or needy caretaker relative, guardian, or conservator.

Nebraska will continue to report on all TANF families and separate state funded families in the quarterly TANF data report (ACF–199) as required.

Separate state program for post-secondary education

Nebraska has implemented a separate state program for single–parent families where the adult or minor parent is participating in an approved post–secondary education component activity. ADC cash assistance provided to these families will be funded with state dollars only. The state general funds used to support this separate state program will apply towards Nebraska's Maintenance–of–Effort requirement. This separate state program took effect November 1, 2004.

Nebraska's Section 1115 waivers allowed the State to count post–secondary education as an approved work activity. With the loss of the Section 1115 waivers, Nebraska's post–secondary education component activity became inconsistent with approved federal work activities. Post–secondary education is specified as an allowable activity under the Nebraska Welfare Reform Act. By creating this separate state program Nebraska will be able to continue post–secondary education as an allowable work activity. Nebraska will continue to report on all TANF families and separate state funded families in the quarterly TANF data report (ACF–199) as required.

Nebraska's maintenance–of–effort qualifying expenditures

To receive full federal TANF funding, Nebraska must have qualifying state expenditures to meet at least 75% of the 1995 level of expenditures. Effective October 1, 2007, Nebraska's TANF Maintenance–of–Effort (MOE) requirement is $28,375,365 at the 75% level and $30,267,056 at the 80% level.

The following are the qualifying state expenditures for Nebraska's TANF Maintenance–of–Effort requirement beginning FFY 2006, with the exception of Nebraska's Earned Income Tax Credit which began qualifying as a TANF Maintenance–of–Effort expenditure for FFY 2007:

1. Cash Assistance. Nebraska's Aid to Dependent Children (ADC) program provides cash assistance to low–income families with minor children to help to meet their basic needs. This program is funded with both TANF federal funds and state general funds. Eligibility is based on the same criteria for TANF cash assistance
2. Employment Assistance. Nebraska's Employment First program provides education, training, employment preparation activities, and supportive services along with other activities and services to recipients of ADC cash assistance. The Employment First program is designed to move families, who are receiving ADC cash assistance, quickly into employment so that they may become economically independent. In order to promote job

advancement and job retention, supportive services may be provided after the loss of eligibility for ADC cash assistance due to earned income:

a. Extended supportive services: Supportive services determined necessary to participate in all approved Employment First activities included in a participant's Self–Sufficiency Contract may be provided for up to three months, if needed, after the loss of eligibility for ADC cash assistance due to earned income.
b. Transitional supportive services: Supportive services determined necessary and critical for job retention may be provided for up to six months, if needed, after the loss of eligibility for ADC cash assistance due to earned income.

3. Administrative Expenses. Nebraska expends funds to administer Nebraska's assistance programs. These administrative costs support staff and necessary overhead. These qualifying state expenditures are developed through our Cost Allocation Plan.
4. Information Systems Expenses. Nebraska expends funds to provide information systems to provide needed information to staff regarding eligibility, client activities, cash payments and services for families receiving assistance. These qualifying state expenditures are developed through our Cost Allocation Plan.
5. Child Care Assistance. Nebraska's Child Care Subsidy program subsidizes child care costs for eligible families. Child Care Subsidy may be available at no cost to families receiving ADC cash assistance or whose gross earned and unearned income is at or below 100 percent of the Federal Poverty Level. Families whose incomes are above the current income standard for the full subsidy may be eligible for a partial subsidy if their gross earned and unearned income is at or below 130 percent of the Federal Poverty Level at initial eligibility or 185 percent of the Federal Poverty Level at redetermination. Families must also show a need for receiving a child care subsidy, such as, but not limited to, job search, employment, education, training, incapacitated parent, and need to obtain medical care.
6. Tribal TANF Programs. Nebraska provides a fair and equitable share of state Maintenance–of–Effort funds to Nebraska Tribes in support of their federally approved Tribal TANF programs. DHHS specifies that the state Maintenance–of–Effort funds provided to the Tribes be used for Tribal cash payments to eligible families. Eligibility is defined in their Tribal Family Assistance Plan (TFAP). DHHS requires the reporting of the use of these funds and the number of families served with these funds.
7. Nebraska Earned Income Tax Credit (EITC). Most states levy state income taxes, but the tax burden on low–income families varies significantly depending on where they l l live. A growing number of states offset this burden with state earned income tax credits and/or state child and dependent care tax credits. These credits are typically based on provisions in the federal income tax code, but states make all decisions regarding eligibility and benefit levels. To be eligible to claim the Nebraska EITC the individual must be a resident of the State of Nebraska and be eligible for and claim the federal EITC on their federal tax return. This tax credit is now refundable, which means it will first be used to lower or eliminate any state income tax s/he might owe and if the credit is larger than what s/he owes in state tax the amount will be refunded.
   - Income eligibility criteria Income eligibility rules same as federal EITC Yes (2019) Income limit for 1–parent family with 2 qualifying children $46,703/year (2019)
   - Benefit level Refundable credit available Yes (2019) Percent of federal EITC 10% (2019) Max benefit for family with 2 qualifying children $583/year (2019)
8. Nebraska Child and Dependent Care Tax Credit. The Child and Dependent Care Tax Credit is a tax benefit that helps families pay for the child care they need in order to work or look for work. The credit is also available to families that must pay for the care of a spouse or an adult dependent who is incapable of caring for himself or herself. Nebraska is counting only the refundable portion of the Nebraska Child and Dependent Care Tax Credit as a qualifying state expenditure for Nebraska's TANF Maintenance–of–Effort requirement.
   - Income eligibility criteria Income eligibility rules same as for federal credit? Yes (2019) Income limit for family with 2 or more qualifying children No limit (2019)
   - Eligible expenses Child care expenses eligible by same rules as federal credit? Yes (2019)
   - Benefit level Refundable credit available? Yes (2019) Benefit structure Credit of 25–100% of federal credit, depending on income (2019) Max benefit for family with 2 qualifying children $6,000/year (2019)
9. Lifespan Respite Subsidy Program for Children. DHHS, Office of Home and Community–Based Services offers respite service to caregivers who need a temporary break from care giving so they can come back refreshed and ready to provide good care again. Respite service pays someone to come into the home, take care of a child with disabilities or special needs, and give the primary caregiver a temporary break. This would include adult children caring for siblings with disabilities or special needs and parents of children with disabilities or special needs. This program pays for respite services (someone to come into the home to care for a child with a disability or special needs to give the primary caregiver a temporary break). It is for people who are not receiving the service from another government program. Caregivers who need a temporary break from providing care to persons of any age

with special needs. Examples of special needs are developmental and physical limitations, emotional or behavioral disorders, chronic illness, Alzheimer's disease and related health concerns, or persons at risk of abuse and neglect. Eligibility is based on income guidelines. However, if you have expenses directly related to the disability, these can usually be subtracted from the counted income. The person applying must have a caregiver. The program will provide up to $125 per client each month. The Lifespan Respite Subsidy Program serves clients whose monthly, adjusted gross income is at or below 312% of the Federal Poverty Guidelines. If eligible, the program will provide a payment for respite services up to $125 per client per month and up to an additional $1,000 per eligibility year for exceptional circumstances, including crisis respite for those who qualify. Benefits may be saved for use up to three months.

TANF Certifications

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

The State Plan must include	*Include*
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—	
3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6.ii. refer such individuals to counseling and supportive services; and	Yes
6.iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.	Yes

Employment and Training Programs Under the Supplemental Nutrition Assistance Program (Programs Authorized Under Section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

a. General Requirements [27]

The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public

inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:

[27] 7 CFR § 273.7(c)(6)

1. *The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed;*

   A. *Non-Education, Non-Work Components*

1. Component Name: Supervised Job Search
   a. Description of Component: Supervised job search is offered for participants who are work-ready as determined by assessment, recently unemployed, underemployed or prefer job search to other components. The supervision is completed in any of the four following ways:
      i. Online – NDOL has a website (NEWorks), accessible from anywhere, through which clients can apply for jobs which tracks jobs for which client has applied. For this section of the component, NEWorks is the state approved location. Clients are credited 1 hour for each application. The time includes time to research and submit applications.
      ii. In-person – Clients that go out into the community to apply for jobs are required to keep a log of the time it takes to apply. During weekly face-to-face contact, or telephone contact if the client is unable to get to an office, workers review and sign off on the time. If clients do not keep exact time, they provide verification of applications and they are credited 1 hour for each application. The state approved locations for this section of the component are the places of employment at which the client is applying and the NDOL office for weekly check-ins or via telephone if the client is unable to get to an office.
      iii. With worker – Clients meet monthly with the worker, during which time the worker assists with applications as necessary. Number of applications and time spent is tracked by worker. NDOL offices are the state approved locations for this section of the component.
      iv. With NDOL – Clients can use NDOL computer labs at NDOL offices for job searching that are supervised by an NDOL worker and have the NDOL worker sign and verify the hours. NDOL offices are the state approved location for this section of the component.
   b. Requirements: Register with NDOL; Report minimum of 5 job contacts weekly for up to 8 weeks total to Employment Specialist. Contact with worker weekly and meet in-person with worker once per month. This applies to all supervision methods.
   c. Geographic area: All 17 E&T Counties, including SNAP Next Step.
   d. Target audience: Work Ready ABAWDs, Unemployed & Underemployed
   e. Anticipated monthly participants (unduplicated count): 20
   f. Anticipated monthly cost: $1,368.33
   g. Provider(s) of component: SNAP E&T Employment Specialist
2. Component Name: Job Search Training
   a. Description of Component: This component is offered for participants who need soft skills for work readiness and job search, such as setting goals, solving problems, choosing careers, using the internet, creating resumes, completing applications and improving interviewing skills. Referrals are given to local resources for health and financial help. Job search training may be combined with unsupervised job search consisting of no more than 50% of the time spent in the component.
   b. Requirements: Discuss handouts with Employment Specialist about tips for job applications, resumes, and job interviews and complete a master application and/or resume. Client works with Employment Specialist for 1 to 5 hours per week based on level of assistance needed.
   c. Geographic area: All 17 E&T Counties, including SNAP Next Step.
   d. Target audience: ABAWDs, Unemployed & Underemployed
   e. Anticipated monthly participants (unduplicated count): 10
   f. Anticipated monthly cost: $684.17
   g. Provider(s) of component: SNAP E&T Employment Specialist.
3. Component Name: Job Retention Services
   a. Description of Component: Job retention services are offered for E&T participants who gain employment after participating in another E&T component. Includes mentoring and job coaching from Employment Specialist, plus supportive services if needed for a minimum of 30 days up to 90 days.
   b. Requirements: Verify New employment

c. Geographic area: All 17 E&T Counties, including SNAP Next Step.
d. Target audience: ABAWDs and Underemployed
e. Anticipated monthly participants (unduplicated count): 15
f. Anticipated monthly cost: $1,026.25
g. Provider(s) of component: SNAP E&T Employment Specialist

B. Education Components:

1. Component Name: Basic Education
   a. Description of Component: Basic education is offered for participants who need Adult Basic Education, High School Equivalency, and English as Second Language classes to increase employability and/or prepare participant for vocational education. State education funds do not cover these classes. Participants are referred to partners NDOL and VR plus any local programs for possible funding first. If not eligible, may use E&T funds. Education may be combined with unsupervised job search consisting of no more than 50% of the time spent in the component.
   b. Requirements: Verify enrollment, completion of program, received a certificate. Education level of effort requirement is a minimum of 12 hours per month. Contact with Employment Specialist and client once per week, face-to-face if able otherwise via telephone, to discuss enrollment, progress, and any needs.
   c. Geographic area: All 17 E&T Counties, including SNAP Next Step.
   d. Target audience: ABAWDs, Unemployed & Underemployed
   e. Anticipated monthly participants (unduplicated count): 3
   f. Anticipated monthly cost: $892.85
   g. Provider(s) of component: NDOL or VR contractors – community colleges, etc.
2. Component Name: Vocational Career Education
   a. Description of Component: Short-term training for in demand job skills and/or credentials needed to prepare participant for work in current or emerging high demand occupations. The most common certifications are for Commercial Driver's Licenses (CDL) for trucking and certified nursing assistant certifications. Participants are referred to partners NDOL and VR plus federal financial aid and any local programs for possible funding first. If not eligible, may use E&T funds. Education may be combined with unsupervised job search consisting of no more than 50% of the time spent in the component.
   b. Requirements: Verify enrollment, attendance, whether passed, received a certificate, credential or license. Education level of effort requirement is a minimum of 12 hours per month. Contact with Employment Specialist and client once per week, face-to-face if able otherwise via telephone, to discuss enrollment, progress, and any needs.
   c. Geographic area: All 17 E&T counties, including SNAP Next Step.Target audience: Low skilled ABAWDs, Unemployed & Underemployed
   d. Anticipated monthly participants (unduplicated count): 4
   e. Anticipated monthly cost: $1,190.47

Provider(s) of component: NDOL or VR contractors – community colleges, etc.

No additional services are currently offered, but the Department is currently reviewing the other potential E&T services to see what the program can effectively offer. Prior to implementation, the Department will consult with outside agencies and the Workforce Development board to determine the most effective way in which to do so.

2. An operating budget for the Federal fiscal year with an estimate of the cost of operation for each Federal fiscal year covered by the Combined Plan. Any State agency that requests 50 percent Federal reimbursement for State agency E&T administrative costs, other than for participant reimbursements, must include in its plan, or amendments to its plan, an itemized list of all activities and costs for which those Federal funds will be claimed, including the costs for case management and casework to facilitate the transition from economic dependency to self-sufficiency through work. Costs in excess of the Federal grant will be allowed only with the prior approval of FNS and must be adequately documented to assure that they are necessary, reasonable and properly allocated. A State must submit a plan amendment to request budget adjustments at least 30 days prior to planned implementation;

Table 56. Anticipated Budget for FFY 2020

Funding Source	Administrative Costs	Participant Reimbursement Costs	Total
Federal Allocation 100%	$347,812	$0	$347,812
50/50 Administrative reimbursements	$0	$0	$0
50/50 Participant reimbursements	$0	$33,161	$33,161
Pledge/ABAWD (estimated)	$0	$0	$0
Match funds	-	-	-
State agency	$0	$33,161	$33,161
County (total)	$0	$0	$0
Third party partner (note name)	$0	$0	$0
Community based partner (note name)	$0	$0	$0
Community college (note name)	$0	$0	$0
Alternate Funding	-	-	-
Direct foundation (note name)	$0	$0	$0
Employer grants (note name)	$0	$0	$0
Cash incentives (note name)	$0	$0	$0
Other (TANF allowable expenses)	$0	$104,000	$104,000
Total	$347,812	$170,322	$518,134

Table 56 provides the anticipated budget for FFY 2020Nebraska expects similar allocations for 100% and 50/50 funding for future FFYs. For FFYs 2021 through 2024, TANF funding is anticipated to increase as follows:

- 2021 - $483,896
- 2022 - $1,414,886
- 2023 - $2,842,621
- 2024 - $2,942,621

3. *The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions;*

Nebraska's SNAP E&T program is voluntary, so there are no exemption types being used. All individuals that wish to participate and are close enough to an office to be able to participate may participate. Only aliens that are not work-eligible and most children under age 18 cannot participate.

4. *The characteristics of the population the State agency intends to place in E&T;*

Answer included in section 3.

5. *The estimated number of volunteers the State agency expects to place in E&T;*

In FFY 2020, Nebraska SNAP E&T expects to enroll 250 volunteer participants in the program. The program will be expanding into the Omaha area starting in FFY 2021 so there are not accurate estimates at this time due to the uncertain nature of the programing.

6. *The geographic areas covered and not covered by the E&T Plan and why, and the type and location of services to be offered;*

Currently SNAP E&T is offered in the cities listed below and the surrounding areas. "Surrounding areas" is not fully defined in order to allow anyone that can reasonably participate in the program to participate, regardless of distance. The cities are:

- Scottsbluff
- Sidney
- North Platte
- Lexington
- Kearney
-
- Grand Island
- Hastings
- Columbus
- Norfolk

All service are offered in all locations. As previously mentioned, the program will be expanding into Omaha starting in FFY 2021 and all services will be offered.

7. *The method the State agency uses to count all work registrants as of the first day of the new fiscal year;*

A report is run by the system in the early morning of October 1st every year that checks for all work registered individuals entered into the N-FOCUS system with an active SNAP case.

8. *The method the State agency uses to report work registrant information on the quarterly Form FNS–583;*

After the report that generates on October 1st, a second report is run on October 2nd and then the first of the month for every subsequent month in the FFY in order to capture new work registrants. This monthly number is compared against the October 1st and other reports prior to it in the year to determine if an individual is a unique or duplicate work registrant.

9. *The method the State agency uses to prevent work registrants from being counted twice within a Federal fiscal year. If the State agency universally work registers all SNAP applicants, this method must specify how the State agency excludes those exempt from work registration under 7 C.F.R. §273.7(b)(1). If the State agency work registers nonexempt participants whenever a new application is submitted, this method must also specify how the State agency excludes those participants who may have already been registered within the past 12 months as specified under 7 C.F.R. §273.7(a)(1)(i);*

Included in Section 8

10. *The organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the Statewide workforce development system, if available. FNS is specifically concerned that the lines of communication be efficient and that noncompliance by the participant be reported to the certification unit within 10 working days after the noncompliance occurs;*

Eligibility Workers (EWs) are responsible for certification and the E&T Workforce Coordinators are responsible for operating the E&T program. Because of the DHHS's partnership with NDOL, the SNAP Next Step workers are located in NDOL American Jobs Center offices whereas EWs are located in DHHS offices. The one exception is the E&T worker in Kearney who works out of a DHHS office. At any time an EW determines a client might be eligible for E&T/Next Step, the can either directly refer to an E&T worker or via an e-mail set up for all referrals.

11. *The relationship between the State agency and other organizations it plans to coordinate with for the provision of services, including organizations in the Statewide workforce development system, if available. Copies of contracts must be available for inspection;*

Nebraska DHHS and DOL's WIOA Title I specifically partner together to co-enroll clients in order to provide comprehensive services and for the programs to assist each other in provide services. This portion of E&T is referred to as Next Step.

12. *The availability, if appropriate, of E&T programs for Indians living on reservations after the State agency has consulted in good faith with appropriate tribal organizations;*

Nebraska E&T Services are not offered in the areas that have Tribal affiliation at this time. If E&T becomes available in those areas, the SNAP Program Manager will consult with the Tribal Organizations to explain the program and its benefits. Thus far, NDHHS has not provided a consultation because E&T has not been offered in a tribal community. If E&T becomes available then consultations will be done annually to support the tribal organization's access to the program. No individuals from a tribe are currently served by the program.

13. *If a conciliation process is planned, the procedures that will be used when an individual fails to comply with an E&T program requirement. Include the length of the conciliation period; and*

Because SNAP E&T is not mandatory in Nebraska, there is currently no conciliation process.

14. *The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.*

SNAP E&T has not developed child care payment rates. The Child Care Subsidy program in Nebraska covers all SNAP E&T clients that are in need of childcare assistance.

15. *The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.*

Allowable participant reimbursements depend on the E&T component and the participant's need. Reimbursements must be for supportive services that are needed by the participant to participate and be successful in that component, and must not be available to them from other agencies, grants or other sources at little or no cost. Allowable examples of participant reimbursements may include, but are not limited to:

- Transportation expense to participate such as gasoline or bus passes. This is commonly $10 to $30 weekly, depending on current local prices and commute distance, minor car repairs, etcetera.
- Job Search related expenses such as clothing needed for job interviews.
- Work-related expenses such as specific clothing, uniform or tools required for a specific job that a participant has accepted.
- Education and/or Training related expenses such as books, equipment, exam or certificate fees required for training.
- Mandatory background checks if required and not normally paid by the employer or school.
- Tuition for Basic Education and Vocational Training

Under special circumstances the SNAP Program Manager may approve an amount over the maximum caps. Below notes the cap maximums allowed by NDHHS per participant per E&T FFY:

- Transportation cap - $500
- Job search related expense cap - $100
- Work Related expenses cap - $200
- Education and/or training related expense cap - $500
- Background check cap - $100
- Tuition cap - $3,000
- Combined cap for all reimbursable expenses - $4,400. NOTE: If someone would exceed the cap, the SNAP Program Manager will determine if the expense will be allowable past the cap.

16. *Information about expenses the State agency proposes to reimburse. FNS must be afforded the opportunity to review and comment on the proposed reimbursements before they are implemented.*

Included in section 15.

b. Able-bodied Adults without Dependents (ABAWD) [28]

A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs) subject to the 3- month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA: [28] 7 CFR § 273.7(c)(7)

1. *Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;*

Nebraska is not a pledge state for ABAWD, however the Department does still serve ABAWDs. As of August 1st, 2019, NDHHS identified 16,093 unduplicated ABAWDs statewide receiving SNAP benefits. This number constitutes approximately 10.08% of all active SNAP participants. A significant need for our ABAWD population is services for homelessness. Eligibility Workers (EWs) provide ABAWD clients with local resources upon request.

EWs are alerted that an ABAWD will be losing his/her eligibility ~30 days before what will be the close effective date. EWs are instructed to contact clients to determine if any new exemptions have arisen or to see if the client is either employed or volunteering. When speaking with the client, EWs inform them of the ABAWD exemptions, including the ability to volunteer.

If the client is within an area served by E&T and/or Next Step, the E&T specialists contact ABAWDs to try to enroll them and to support them in their ability to meet the ABAWD work requirement through a qualifying E&T component.

The two components that NDHHS offer that meet the ABAWD work requirements are Basic Education and Vocational Training

2. *Estimated costs of fulfilling its pledge;*

Nebraska is not a pledge state. See b. 1.

3. *A description of management controls in place to meet pledge requirements;*

Nebraska is not a pledge state. See b. 1.

4. *A discussion of its capacity and ability to serve at-risk ABAWDs;*

See b. 1.

5. *Information about the size and special needs of its ABAWD population; and*

See b. 1.

6. *Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement*

See b. 1.

Trade Adjustment Assistance (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Yes

Jobs for Veterans' State Grants

(OMB Control Number: 1225-0086)

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported quarterly on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a multi-year grant approval cycle modified and funded annually. In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

a. Employment, training and job placement services to veterans and eligible persons

How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

Introduction

DVOPs and LVERs have formed strong partnerships with other AJC programs to integrate Veteran services and to promote employment, training, and placement opportunities for Veterans throughout the areas of the state. This includes integration with state and Federal agencies. This integration ensures that qualified Veterans can be simultaneously enrolled with other partner programs such as Wagner-Peyser, Trade Adjustment Assistance (TAA), Workforce Innovation and Opportunities Act (WIOA), and Vocational and Rehabilitation Employment Program (VR&E).

Nebraska National Guard

In collaboration with the Nebraska National Guard (NENG), Wagner-Peyser staff routinely attends unit demobilization and reintegration trainings to assist eligible Veterans with employment and training services. These events, known as

"Yellow Ribbon Events" provide staff an opportunity to promote Veteran services to newly separated Veterans. DVOPs work with Wagner-Peyser staff to inform and educate them on relevant information to promote and share. NDOL conducts training sessions to present job search, resume, and interviewing skills workshops to NENG members during weekend unit trainings and other appropriate occasions. NDOL will develop, implement, and offer new and updated informational sessions during NENG weekend training sessions as needed.

Nebraska VR Program

The Nebraska VR sponsors a statewide Brain Injury Advisory Council (BIAC) and facilitates education and trainings for those providing services to this unique population with Federal Traumatic Brain Injury (TBI) grant funds. NDOL is working to ensure that all DVOP and LVER staff has the opportunity to attend these informational sessions and to access free, online TBI education and training resources. This allows the DVOP and LVER staff to address the employment barriers created by TBIs.

Veterans Benefits Administration

NDOL continues to develop and refine the relationship with the Veterans Benefits Administration Regional Office regarding assistance and monitoring of Chapter 31 Veterans. In Nebraska, the state Intensive Services Coordinator (ISC) provides Chapter 31 referrals from VR&E Counselors to DVOP staff across the state. Upon receipt of the referral, DVOP staff provides initial Labor Market Information (LMI) or employment services. Initial LMI is provided to help the Vocational Rehabilitation Counselor (VRC) and the Veteran choose suitable occupation and training choices leading to self-sufficiency. DVOPs, with assistance from LVER staff, provide employment and placement services near the completion of the Veteran's Chapter 31 training.

Nebraska Department of Correctional Services

DVOPs provide outreach, employment, and training information to incarcerated Veterans at state- and county-level correctional facilities, the majority of which are located near the Lincoln and Omaha AJCs. DVOP-outreach at these facilities is scheduled as needed when Veterans are identified within the incarcerated population. Eligible incarcerated Veterans who are approved for work release are referred to DVOPs for job development and other placement activities and provide optimal support as the incarcerated Veteran transitions to life outside the correctional institution.

Nebraska Homeless Continuums of Care

The preponderance of homeless Veterans are located in the Omaha and Lincoln metropolitan service delivery areas, which have the greatest number of support agencies available to provide assistance through the Nebraska Homeless Continuums of Care and their community partners. However, regardless of location, when a homeless Veteran is identified, DVOPs will commence and coordinate support activities with local shelters and health organizations to provide for basic subsistence needs and referral to job training activities or agencies. If job ready, DVOPs provide job placement and referral services and initiate contact with public housing and social service agencies to provide needed support services when transitioning to employment.

All DVOP and LVER staff has the responsibility to expand partnerships and coordination with other resource and community agencies in their locations in order to locate and assist the various Veteran groups and provide additional services. LVER staff will work with industry employers and employer associations to identify the skills needed for in-demand occupations. If applicable, LVERs will provide information on military skill identifiers and military occupational specialties that possess similar skills and experiences but may be unknown to employers due to differences between military and civilian terminology. LVER staff will work with additional agencies including Nebraska State Vocational Rehabilitation, local County Veteran Service Offices, Vet Centers, satellite VA clinics, homeless shelters, and NENG units, etc., to develop the in-demand skills that have been identified. LVERs will keep DVOPs well informed of in-demand occupations and related job training opportunities. DVOPs will present information on services and opportunities in high-demand, high-skill, and high-wage occupations while conducting career counseling. DVOPs will assist Veterans and eligible spouses in making decisions based on individual needs in conjunction with the projected labor market information.

The Nebraska Department of Labor (NDOL) has partnered with the US Department of Labor Office of Apprenticeship to assist with the screening and assessment for the local electrical workers and steamfitters unions. Additionally, NDOL has developed a dedicated Veteran's services web page outlining available resources. Through this web page, Veterans and military personnel can access the current NDOL office directory that provides location and contact information for one-stop centers across the state. The web page includes information regarding priority of service, job

search services, job fair information, and links to other Veteran service organizations, Federal employment information, and state and Federal benefit information.

Success regarding services to Veterans will be monitored and assessed through existing reporting mechanisms. This includes quarterly reports and reports located within NEworks (Nebraska's management information system). These reports currently provide information on employment and training activities for Veterans with SBE's and the targeted populations at state, regional, or local levels.

c. Duties assigned to DVOP specialists and LVER staff

The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;

DVOP Staff

All DVOPs are state merit staff assigned to a Nebraska Department of Labor (NDOL) location or American Job Center. DVOPs are integrated into the one-stop delivery system and are well versed in the process of developing and maintaining strong relationships with other service providers and program partners to promote employment, training, and placement services for Veterans. NDOL conducts numerous public relations activities to ensure the public is aware of the services available to Veterans. This includes the use of informational pamphlets, webpages, and social media posts containing information about the employment services offered by DVOPs and LVERs.

DVOPs will provide or coordinate the full range of employment and training services to Veterans with SBE's and other eligibles in accordance with the VPL 03-14 Change 2 and VPL 03-19. The intent is to serve Veterans with SBE's and other eligibles with the following Significant Barriers to Employment (SBE) or within the following target populations:

- special disabled or disabled Veterans;
- Vietnam Era Veterans;
- homeless Veterans, to include those fleeing domestic violence and other dangerous or life-threatening conditions;
- recently-separated service members who at any point in the previous 12 months has been unemployed for 27 or more weeks;
- offenders who are currently incarcerated or released from incarceration;
- Veterans lacking a high school diploma or equivalent;
- low-income Veterans;
- Veterans between the ages of 18-24;
- Transitioning Service Members (TSM's) identified as in need of intensive services;
- members of the Armed Forces who are wounded, ill, or injured and receiving treatment in a Military Treatment Facility (MTF) or Warrior Transition Unit (WTU); and
- spouses or other family caregivers of wounded, ill, or injured members of the Armed Forces.

These Veterans may be identified and referred through other partner or program staff such as WIOA Title I and III programs, Trade Adjustment Assistance (TAA), Unemployment Insurance, Nebraska Department of Health and Human Services, Nebraska VR Program, and Veteran County Service officers. Regardless of the referral source, the provision of direct services provided by DVOP staff to Veterans with a SBE may include:

- initial and/or in-depth assessment;
- intensive services as defined in VPL 3-14;
- case management activities and established case files;
- Individual Employment Plans (IEP);
- provision of labor market information;
- referral to supportive service programs and resources;
- co-enrollment (shared case management responsibility) with other agency, state or partner staff;
- job search assistance;
- job development; and
- individual or group career counseling.

DVOP staff will also place emphasis on outreach activities and partnerships with other NDOL partners and programs within their local communities to locate those Veterans who may benefit from individualized services. DVOPs will provide technical assistance or guidance as needed to community-based organizations and assist other NDOL staff in carrying out their responsibilities to serve Veterans.

All VR&E/Chapter 31 Veterans referrals will be disseminated to DVOP staff. The referral process will be coordinated through the State ISC. VR&E counselors will outline needed services for the Veteran that may include the need for labor market information, assessments, and job placement services. DVOP staff will case manage and track those Veterans deemed as job ready or who are within 60 days of completing their Individual Written Rehabilitation Plan (IWRP). DVOP staff will be required to maintain regular communication with the Veteran and provide monthly updates to the ISC regarding the Veterans' progress.

DVOP responsibilities and job functions

DVOP Responsibilities and Job Functions include:

1. Outreach
    a. provide outreach services to the entire service area, including surrounding towns outside of the NDOL location;
    b. actively recruit eligible Veterans and spouses through consistent and on-going efforts, which include:
        i. partnering with Wagner-Peyser Employment Service staff regarding referrals to DVOPs;
        ii. developing and expanding partnerships with agencies that serve Veterans;
        iii. communicating with Veteran service staff from other Veteran programs, such as Nebraska Veteran Affairs, and Veteran Service Officers (VSOs); and
        iv. partnering with community colleges, state colleges, universities and other educational institutions to obtain Veteran referrals;
    c. review newly-registered reports in NEworks (Nebraska's management information system) and partner with Wagner-Peyser Employment Service staff to receive Veteran referrals; and
    d. maintain beneficial relationships with area VSOs, VFWs, American Legions, local armories, Salvation Army, rescue mission, Goodwill, National Guard and Reserve, community foundations, chambers of commerce, and other organizations that serve SBE veterans within their area of operation;
2. Service Delivery
    a. recruit, enroll, and maintain an active caseload that corresponds to the staffing matrix: 1.0 FTE = minimum of 40 unique newly case-managed Veterans annually;
    b. provide all Veterans on the caseload with individualized career services;
    c. maintain an active caseload that accurately reflects the Veterans being provided individualized career services;
    d. remove Veterans from case management at the conclusion of ongoing individualized career services; and
    e. continuously evaluate the intensive services provided to Veterans to determine if sufficient progress is being made and how the Veteran is benefitting from case management;
3. Program Knowledge
    a. be informed of changes in Veteran related policies and programs and share relevant information with staff and management;
    b. attend National Veterans Training Institute (NVTI) training; and
    c. participate in Vets Technical Assistance activities, webinars, and trainings.

Management responsibilities to support DVOPs

Management responsibilities to support DVOPs include:

The manager is responsible for the workload and production level of the DVOP. To ensure that that the DVOP is working productively and meeting the goals of the VETS program, the Manager will:

1. meet on a regular basis with the DVOP to discuss the following:
    a. outreach and enrollment efforts;
    b. obstacles that are preventing the DVOP from meeting expectations;
    c. enrollments and services provided since the previous meeting;

   d. DVOP strengths and opportunities for improvement; and
   e. issues, questions, and concerns will be discussed;
2. review all new enrollments to ensure data integrity and program eligibility are met;
3. determine the need for and request technical assistance from the Veterans Program Coordinator;
4. assist in coordinating necessary NEworks Training and technical assistance to be provided by the manager, NDOL administration, and/or the Veterans Program Coordinator;
5. assist in coordinating National Veterans Training Institute (NVTI) training;
6. monitor DVOP progress using NEworks reports;
7. run and share appropriate NEworks reports, including Enrolled Individual reports and Services Provided Individual reports, to inform the DVOP of progress and identify areas of concern; and
8. conduct quality control (monitoring, data integrity, oversight, etc.) to ensure that program guidelines, rules, and expectations are followed.

LVER Staff

Nebraska will support four (3.0 FTE) LVER positions in this next fiscal year, each with specific duties and responsibilities.

LVER Field Staff

One LVER position is assigned to the Omaha AJC location. As the Omaha metro area serves up to 60 percent of Nebraska's employment and training customers and the majority of the state's job seeking Veteran population, Omaha is the only locale with a defined Veterans unit consisting of three DVOP and one LVER staff. This unit receives and serves the majority of Chapter 31 referrals in Nebraska.

Lincoln LVER

The remaining two (1.5 FTE) LVER positions will operate out of the Lincoln (1 FTE) and Hastings (0.5 FTE) offices, respectively. The Hastings LVER will serve the Grand Island, Kearney, and Hastings region. The LVERs functioning in these areas will provide support to employers in attracting, hiring, and retaining quality Veteran candidates.

The outlined duties do not preclude the overarching LVER responsibility to ensure that Veterans are provided the full range of labor exchange services to meet their employment and training needs. The LVER shall be available to provide guidance and/or technical assistance to NDOL staff regarding the identification and referral of those Veterans who may benefit from more intensive services provided, by either DVOP staff or other partner programs.

The LVER's two primary roles per 38 U.S.C. 4104(b), VPL 3-14, and NVTI Employer Outreach training, are to:

1. conduct outreach to area employers to assist veterans in gaining employment; and
2. facilitate employment, training, and placement services furnished to veterans in the American Job Center (AJC), defined as capacity building within the AJC.

The LVER is also responsible for advocating for all veterans, not just SBE veterans, and will be a fully integrated member of the AJC's business services team to advocate for veteran hiring. Nebraska's service model does not allow for placement of both business service representatives (BSR) and LVER staff in all regions. Therefore, BSR staff will fulfill the role of the LVER if there is no LVER located in their region. If any BSR staff requires assistance with helping an employer attract, onboard, or retain veterans or assisting an employer with setting up a veteran hiring initiative, the BSR contacts and teams up with the LVER to serve the employer.

Role 1 – Outreach to employers to facilitate Veteran employment

- conduct outreach to area employers to assist veterans in gaining employment by:
  - marketing veterans as individuals with highly marketable skills and experience;
  - conducting employer outreach to build relationships;
  - coordinating and participating with other business outreach efforts;
  - contacting individual employers on behalf of Chapter 31 Veterans;
  - coordinating with unions, apprenticeship programs and businesses or business organizations to promote and secure employment and training programs for Veterans;
  - informing federal contractors of the process to recruit qualified Veterans
  - planning and participating in job and career fairs;
  - promoting credentialing and licensing opportunities for Veterans;

- conducting seminars for employers; and
- coordinating and participating with other business outreach efforts by tapping into employer contacts and networks.

Role 2 – Capacity building within the AJC

- facilitate employment, training, and placement services as defined by VETS as the act of "capacity building" within the AJC to ensure easier access to the appropriate employment and training services for job seeking veterans:
  - playing an important role in assisting with the development of the service delivery strategies for Veterans in their assigned AJC;
  - advocating for Veterans by educating all AJC partner staff on current employment initiatives and programs for veterans, including priority of service, WIOA Title I, and other partner programs;
  - working directly with other AJC partner staff to assist with placement of Veteran participants;
  - providing targeted referral to employers and job openings; and
  - conducting job search assistance workshops for Veterans.

JVSG Program Coordinator

One 0.5 FTE LVER will be assigned to the state's administrative office and serve as the state JVSG Program Coordinator. Primary duties for the JVSG Program Coordinator will be to provide technical assistance to DVOPs and LVERs regarding guidance issued by NDOL and the US Department of Labor and other policies and mandates regarding services for Veterans. This position will also be responsible for all quarterly and annual reporting requirements as defined in the JVSG. This LVER will also assist in coordinating staff attendance at Veteran-focused job fairs, Nebraska National Guard demobilization activities in their assigned areas, and compiling the Quarterly Managers Report on Services to Veterans.

c. The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or American Job Center;

In all areas of the state, DVOP specialists and LVER staff collaborate effectively with agency staff, partner staff, and other programs within Nebraska's employment service delivery system to optimize the provision of individualized career services to Veterans with SBE's and other eligibles. JVSG staff, in coordination with Regional Management and the Veterans Program Coordinator (VPC), are active participants in providing technical assistance to agency and partner staff regarding services available to Veterans with SBE's and other eligibles; developing best practices for all partners to ensure priority of service for Veterans; and working collaboratively to develop new partnerships within the community.

DVOP specialists and LVER staff are strategically integrated into the State's employment service delivery system and American Job Centers network by allocating grant funded staff proportionately to regional service demand. There are four comprehensive American Job Centers and 11 additional one-stop center locations in Nebraska. There will be 9.5 grant funded DVOPs located in Beatrice, Columbus, Grand Island, Lincoln, Norfolk, North Platte, Omaha, and Scottsbluff. In addition, there will be 3.0 grant funded LVERs: 2.5 grant funded LVERs located in Hastings, Lincoln, and Omaha and one 0.50 grant funded LVER administration position providing program support. Table 57 provides detail on staff locations.

Table 57: Deployment of JVSG Staff within Nebraska

Region	Program	Number of Staff	Number of Counties
Western	DVOP	1.0	11
Mid-Plains	DVOP	0.5	19
Central	DVOP	1.0	22
Southeast	DVOP	1.0	13
Northeast	DVOP	2.0	23
Lincoln	DVOP	1.0	2
Omaha	DVOP	3.0	3
Omaha	LVER	1.0	3
Lincoln	LVER	1.0	2
Hastings	LVER	.50	22
Administration	LVER	.50	Program Support

NDOL will work to fill any DVOP and LVER vacancies as expeditiously as possible. When notified of a potential opening or staff intent to vacate a position, managers will seek approval or authorization from management to hire as soon as possible. This may include filling vacant positions with temporary or interim positions. Additionally, NDOL will make every attempt to satisfy the requirements of 38 USC 4102A(c)(8), which states that all newly assigned DVOP and LVER staff will receive training from the National Veterans' Training Institute within 18 months of assignment.

d. Incentive Award program

The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

Overview

Nebraska's JVSG Program utilizes both cash and non-cash incentive awards authorized under VPL 04-19 to recognize both employees and offices that provide exceptional service to Veterans and eligible persons. Based on the variance of funding from year to year, availability of resources and unforeseen (or mitigating) circumstances (such as COVID-19), the state will select the best and most appropriate option to ensure Incentive funds are awarded and expended.

Pursuant to Federal guidance, one percent of the state's JVSG funding may be used for Veterans Performance Incentive Awards. The objective of the incentive program is to encourage staff attunement to the needs of Veterans and motivate staff to provide outstanding service. A second, but equally important objective is to ensure there is continuous improvement within the JVSG program.

Nebraska's JVSG Program reserves the right to select any combination of potential Individual and/or Office Incentive awards, cash and non-cash, as permitted by VPL 04-19 and detailed below to ensure objectives of the Incentive Award Program are met while remaining flexible to unforeseen and mitigating circumstances.

Individual Incentive Awards

Nebraska prefers to utilize its incentive award fund to send as many staff as fiscally possible to the annual NASWA Veterans Conference. The entire JVSG Incentive fund may be used to finance this training and related expenses, with non-incentive fund supplementation if necessary. NASWA attendance will continue to be NDOL's preferred individual incentive award, as we see great utility in the collaboration and training provided.

In the event an annual NASWA Veterans Conference, or other designated Veterans Conference, is unavailable due to unforeseen circumstances, NDOL may utilize cash payments for Individual Incentive Awards. Eligible individuals include Disabled Veterans' Outreach Program (DVOP) specialists, Local Veterans' Employment Representative (LVER) staff, and any other individual who provides employment, training, and placement services to veterans in accordance with VPL 04-19(V)(a).

Individual cash awards will be limited to $500 per recipient each year, in compliance with state bonus and pay-for-performance policies. Nominations for individual's incentive awards are submitted and scored by the selection committee as detailed below.

Submissions for individual awards may include any activity that demonstrates exceptional service to Veterans. Activities must have taken place during the current program year, which runs July 1 through June 30. Submissions must clearly indicate they are for Incentive Award consideration. For example, the Veterans Program Coordinator will not assume the VETS Success Story submissions are also Incentive Award submissions unless clearly marked as such. Examples of activities that may be considered include:

- exemplary success story showcasing substantial assistance with overcoming SBEs leading to successful job placement or development;
- developing and sharing a best practice that has greatly benefited Veterans, possibly on a technical assistance call;
- launching a new program or initiative that promotes employment or training opportunities for Veterans, SBE Veterans, and other Eligibles.

Employment Service Office Awards

In the event an annual NASWA Veterans Conference, or other designated Veterans Conference, is unavailable due to unforeseen circumstances, NDOL may utilize non-cash incentives for Employment Service Office Awards. Eligible offices are any service delivery point in Nebraska that provide exemplary public employment and training services to veterans; American Job Centers operated by State Workforce Agencies; and others in accordance with VPL 04-

19(V)(a). Recipient offices are granted the liberty to purchase eligible equipment, supplies, and merchandise; attend all-staff professional development courses, lectures, or seminars; invite guest speakers to discuss veteran's issues; or other eligible non-cash alternatives permissible under VPL 04-19(V)(a) and approved by the Veterans Program Coordinator, Workforce Services Administrator, and Deputy Commissioner for Reemployment Services. Submissions for office awards must demonstrate instances of all-staff collaboration and teamwork to effectively serve veterans. Activities must have taken place during the current program year, which runs July 1 through June 30. Examples of activities that may be considered include:

- fostering or strengthening partners relations at the local level that are of benefit to Veterans, directly resulting in successful job placement or development of Veterans, SBE Veterans, and other Eligibles;
- implementing exceptional priority-of-services throughout the local workforce system;
- providing significant and demonstrable improvements in the provision of services to Veterans throughout the local workforce system.

Submissions

Awards will occur annually on the following timeline:

- June 30: Submission deadline (the state reserves the right to adjust this deadline based on conference availability, travel restrictions, or other public health related considerations);
- July 15 (NLT): Announcement of recipients;
- August 10: All allocated funds via purchase request submitted to NDOL procurement;
- September 30*: Obligated or encumbered funds via procurement; and
- December 31*: Funds expended.

*Any funds not obligated or encumbered by September 30 or expended by December 31 will be forfeited.

NDOL's Veterans Program Coordinator, Workforce Services Administrator having oversight of the JVSG Program, and Deputy Commissioner of Reemployment Services will function as the selection committee for these awards.

e. populations of eligible veterans to be served

The populations of eligible veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

In accordance with VPL 03-14 Change 2 and VPL 03-19, Nebraska is placing emphasis on service to Veterans in need of individualized career services. In order to identify Veterans most in need, all American Job Centers (AJC) and one-stop centers will conduct "first point of contact" initial assessments. Veterans are afforded the opportunity to disclose voluntarily information that allows AJC and one-stop center staff to determine if there is a need for individualized career services. If there is a need, the Veteran with Significant Barriers to Employment (SBE's) or other eligible is referred to a DVOP to deliver individualized career services as defined in Veterans Program Letter VPL 03-14 Changes 1 and 2 and VPL 03-19, and listed below.

- Special disabled or disabled Veterans, as those terms are defined in 38 USC § 4211(1) and (3) are those who:
    - are entitled to compensation, or but for the receipt of military retired pay would be entitled to compensation, under laws administered by the Secretary of Veterans Affairs; or
    - were discharged or released from active duty because of a service-connected disability.
- Vietnam-era Veterans are those who are defined as an eligible veteran and either:
    - served at least one day in the Republic of Vietnam between February 28, 1961 and May 7, 1975; or
    - served at least one day on active duty at any location between August 5, 1964 and May 7, 1975.
- Homeless Veterans, including those fleeing from domestic violence and other dangerous or life-threatening conditions, as defined in VPL 3-14 Change 2.
- Recently-separated service members, as defined in 38 USC § 4211(6), are those who at any point in during the previous 12 months have been unemployed for 27 or more weeks, and transitioning service members (TSMs) identified as in need of intensive services are those who:
    - do not meet career readiness standards receiving a "warm handover" from commander or as documented on form DD-2958; or
    - were released from active duty because of a service-connected disability.

- Offenders, as defined under WIOA Sec. 3(38), are those who are currently incarcerated or have been released from incarceration.
- Veterans lacking a high school diploma or equivalent are considered.
- Veterans who are low-income individuals, as defined under WIOA Sec. 3 (36), are considered.
- Veterans who are between the ages of 18-24 are considered.
- Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in a Military Treatment Facility (MTF) or Warrior Transition Unit (WTU) are considered.
- Spouses or other family caregivers of such wounded, ill, or injured members of the Armed Forces are considered.

f. How the State implements and monitors the administration of priority of service to covered persons;

Per Grant Officer Memorandum 01- 20, a response to this section is not required.

g. How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff:

1. Job and job training individualized career services,

Per Grant Officer Memorandum 01- 20, a response to this section is not required.

2. Employment placement services, and

Per Grant Officer Memorandum 01-20, a response to this section is not required.

3. Job-driven training and subsequent placement service program for eligible veterans and eligible persons;

Per Grant Officer Memorandum 01-20, a response to this section is not required.

h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and

Listed below are staff hire dates and mandatory training completion dates for DVOP Specialists:

- Arthur Davis hire date August 12, 1996; mandatory training completed August 30, 2011;
- Tom Gann hire date February 18, 2020; mandatory training ongoing;
- Sandy Grigg hire date March 3, 1997; mandatory training completed March 6, 2001;
- Mike Nordyke hire date October 15, 2018; mandatory training completed March 22, 2019;
- David Patzer hire date May 18, 2020; mandatory training ongoing;
- Dave Rangeloff hire date August 1, 1996; mandatory training completed May 1, 2001;
- Nina Rogers hire date December 26, 2009; mandatory training completed November 22, 2014;
- Andrew Strasburg hire date October 3, 2016; mandatory training completed September 15, 2017;
- Alan Trook hire date January 12, 2015; mandatory training completed July 31, 2015; and
- Joshua Whited hire date August 11, 2014; mandatory training completed June 5, 2015.

Listed below are staff hire dates and mandatory training completion dates for LVER staff (including the Program Coordinator) staff:

- Dave Bopp hire date August 5, 2019; mandatory training ongoing;
- Mark McDonald (Program Coordinator) hire date February 3, 2020; mandatory training ongoing;
- Gregory Gentert hire date August 16, 2018; mandatory training completion December 14, 2018; and
- Jon Lokamas hire date February 3, 2020; mandatory training ongoing.

Note: State of Nebraska hire dates may not align with start dates as DVOP Specialists or LVERs.

Additional NVTI training is made available to DVOP Specialists and LVER staff as schedules allow. NVTI training is prioritized for new hires in order comply with training mandates.

i. Such additional information as the Secretary may require.

Not applicable.

Unemployment Insurance (UI)

(OMB Control Number: 1205-0132)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

a. Contents of a Complete UI SQSP Package

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

1. Transmittal Letter

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

NEBRASKA

Good Life. Great Connections.

DEPARTMENT OF LABOR

September 20, 2019

Mr. Jason M. Hudson
U.S. Department of Labor, Region V
Employment & Training Administration
230 South Dearborn, Room 602
Chicago, IL 60604

Dear Mr. Hudson:

The Nebraska Unemployment Insurance State Quality Service Plan (SQSP) has been prepared in accordance with the guidelines established by the United States Department of Labor, Employment, and Training Administration; contained in ET Handbook No. 336, 18th Edition, Change 4 (UIPL 15-19) and Additional Planning Guidance for the Fiscal Year (FY) 2020 Unemployment Insurance (UI) State Quality Service Plan (SQSP) (UIPL 15-19).

Transmitted with this letter is an electronic copy of the Nebraska Unemployment Insurance SQSP for Fiscal Year 2020.

The Nebraska Department of Labor staff is available for discussion, and clarification of this document. Please contact Bennie Shobe, Unemployment Insurance Tax Program Analyst at 402-471-9881 with any questions.

Sincerely,

John H. Albin
Commissioner of Labor

Enclosures

John H. Albin, Commissioner
Department of Labor
dol.nebraska.gov

2. *Budget Worksheets/Forms*

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: NE-All
* b. Program/Project: NE-All

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2019
* b. End Date: 09/30/2020

18. Estimated Funding ($):

* a. Federal	13,574,772.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	13,574,772.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [x] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix	Mr.
* First Name	John
Middle Name	H.
* Last Name	Albin
Suffix	
* Title	Commission of Labor
* Telephone Number	402-471-3405
Fax Number	402-471-9917
* Email	john.albin@nebraska.gov
* Signature of Authorized Representative	
* Date Signed	09/18/2019

BUDGET INFORMATION - Non-Construction Programs

OMB Number: 4040-0006
Expiration Date: 01/31/2019

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.		$	$	$ 13,574,772.00	$	$ 13,574,772.00
2.						
3.						
4.						
5. Totals		$	$	$ 13,574,772.00	$	$ 13,574,772.00

Standard Form 424A (Rev. 7- 97)
Prescribed by OMB (Circular A -102) Page 1

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY (1)	(2)	(3)	(4)	Total (5)
a. Personnel	$	$	$	$	$
b. Fringe Benefits					
c. Travel					
d. Equipment					
e. Supplies					
f. Contractual					
g. Construction					
h. Other					
i. Total Direct Charges (sum of 6a-6h)					$
j. Indirect Charges					$
k. TOTALS (sum of 6i and 6j)	$	$	$	$	$
7. Program Income	$	$	$	$	$

Authorized for Local Reproduction

Standard Form 424A (Rev. 7- 97)
Prescribed by OMB (Circular A -102) Page 1A

SECTION C - NON-FEDERAL RESOURCES				
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e)TOTALS
8.	$	$	$	$
9.				
10.				
11.				
12. TOTAL (sum of lines 8-11)	$	$	$	$

SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	$ 13,574,772.00	$ 3,419,599.05	$ 3,367,786.95	$ 3,367,786.95	$ 3,419,599.05
14. Non-Federal	$				
15. TOTAL (sum of lines 13 and 14)	$ 13,574,772.00	$ 3,419,599.05	$ 3,367,786.95	$ 3,367,786.95	$ 3,419,599.05

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)			
	(b)First	(c) Second	(d) Third	(e) Fourth
16.	$	$	$	$
17.				
18.				
19.				
20. TOTAL (sum of lines 16 - 19)	$	$	$	$

SECTION F - OTHER BUDGET INFORMATION	
21. Direct Charges:	22. Indirect Charges:
23. Remarks:	

Authorized for Local Reproduction

Standard Form 424A (Rev. 7- 97)
Prescribed by OMB (Circular A -102) Page 2

OMB Number: 4040-0007
Expiration Date: 02/28/2022

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424B (Rev. 7-97)
Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Commissioner of Labor
APPLICANT ORGANIZATION	DATE SUBMITTED
Nebraska Department of Labor	09/26/2023

Standard Form 424B (Rev. 7-97) Back

3. *The State Plan Narrative*

State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

STATE PLAN NARRATIVE
Nebraska – FY 2019-2020

A – Overview

In FY 2019 the UI Program continues to see a seasonally adjusted downward trend in the number of initial claims filed and a decreases in benefit payment workloads compared to prior years. Processing benefit claims accurately and timely remains a priority along with a continued focus on improvement in all performance measures. During the fall of 2019 and spring of 2020 UI Benefits Modernization will offer automated improvements to many of the UI Program functions. Modernization will also afford opportunities for additional training all UI Benefit staff which will lead to better performance numbers in across all categories.

During FY 2019 The UI Tax system made modifications to the State Income Tax Intercept (SITI). The SITI program became active in the spring of 2017. Along with the Treasury Offset Program (TOP) and SITI, UI Tax staff has worked with UI Benefits on other modernization projects including completed the development of the business and technical requirements for a Short Time Compensation (STC) program—workshare—in Nebraska.

UIConnect, Nebraska's employer portal, allows employers to register for a UI Account, file and pay UI Combined Tax and Wage reports, file UI Benefits separations, Appeals and Benefit Payment Audits. A majority of Nebraska employers file UI Combined Tax Reports electronically using UIConnect or Bulk filing, or by paper. For the first quarter 2019, 53,569 combined tax reports (91.18% of a total 58,749 filings) were filed electronically of which 30,797 (52.42%) were filed via UIConnect. Approximately 85% of payments were received electronically.

Nebraska recognizes the importance of maintaining a solvent trust fund. An array system has been used since CY 2006 to determine employer combined tax rates. The trust fund balance dropped below the solvency range for the CY 2010. The trust fund balance returned to solvent range for CY 2012 and above the solvency range for CY 2013 through present. This has allowed the expected yield to repeatedly fall below prior year benefit payments. Nebraska maintains one of the highest solvency rates in the nation, posting an Average High cost Multiple (AHCM) of 1.73 in 2019. While it did increased, from 1.70 in 2018, Nebraska's rate remains in the top 10 when ranked against the other states and territories based upon its AHCM.

B – Federal Emphasis

Improving State Capacity to Administer and Operate the UI Program Effectively

During FY 2019 Nebraska experienced a slight reduction in workload. This has given the state an opportunity to update system processes and technologies that were delayed during previous years. In preparation for the increased workloads resulting from anticipated economic downturns in the future, the UI Benefits program has renewed focus on leveraging technology in expanding public access to the program.

Nebraska maintains a very high online initial claim filing rate and online weekly claim rate. While alternative accessibility options have always been available to UI claimants, Nebraska continues to explore and implement new strategies strengthening public access to benefits, including revamped web materials. Planned FY 2019 technological revisions to the Nebraska Claims Center will allow increased information accessibility 24/7. The web portal, UI Connect, designed for the filing of tax reports and the payment therein continues to increase in employer usage as SIDES Single Sign On (SSO) was deployed in the summer of 2018. The portal continues to grow and develop enhancements that allow employers more access to actual employer data such as benefit charges, ability to appeal determinations, report fraud, and contact local resources for further clarification.

Increased staff turnover over the past few years has emphasized the importance of strengthening training efforts. Nebraska recognizes the importance of maintaining and nurturing a knowledgeable UI staff as senior staff begin

to retire. A renewed emphasis on training continued in FY 2019 with the pre-implementation of Graphic Solution Unemployment Systems (GUS) because many of the experienced claims specialist and adjudicators were needed for testing and new staff were hired

Improving Prevention, Detection, and Recovery of UI Improper Payments

In recent years, Nebraska has focused UI Program integrity efforts on decreasing improper payments rates by emphasizing Employment Services Registration. Nebraska requires claimants to use a Single Sign-On solution integrating the Agency's Employment and Training (E&T) and UI computer systems. All workers filing an unemployment claim are required to register with Employment and Training prior to filing an initial claim, virtually eliminating Employment Services registration errors. Initially, claimant Single Sign On and the required employment services registration led to a decline, improper payments attributable to registration. Yet improper payment rates continue to be an issue.

BAM statistics indicate Nebraska has experienced an increase in Benefit Year Earnings (BYE) improper payments and to poor reporting of separations monies received by claimants, i.e., Severance, Vacation, Supplemental Social Security (SSI) and pension payments. Improving Nebraska's overpayment detection and recovery rate is a high priority and will be discussed in the Integrity Action Plan.

Along with an additional focus of detection of overpayments, Nebraska continues to see success in the recovery of improper payments through the Treasury Offset Program (TOP) and State Income Tax Intercept (SITI). Both programs have proved valuable for the ongoing recovery of eligible debts. Procedurally, the Agency revised policies allowing State Income Tax Intercept efforts to broaden resulting in increased recovery. Additionally, Nebraska provides claimants an online payment portal providing an electronic payment method for claimants with overpayment collections due.

Workforce Innovation and Opportunity Act (WIOA) and Facilitate the Reemployment of Claimants

Wagner-Peyser funds support unemployment insurance claimants through the regular and ongoing provision of Employment Services throughout the workforce system. Nebraska Department of Labor has a contract with Geographic Solutions Inc. (GSI) for the NEworks Virtual One Stop (VOS) module system used for Employment Services, including labor exchange services. These systems are scheduled to be integrated with GUS in the fall of 2019 and spring of 2020

NEworks offers customers a powerful and robust system to search for job openings. The state's public labor exchange provides job search and employment assistance opportunities that can be self-assisted (by the customer) or staff-assisted. The web-based system means these services are available for customers to access directly 24/7, and at their convenience. It also allows staff and employers to view job seeker resumes and work history, and create job referrals based on the candidate's abilities.

UI provides dedicated phone lines in the One-Stop Centers located across the state. The phones are labeled with a sign designating them as a resource for individuals seeking assistance with filing a UI claim. In addition to the dedicated phones, there are also dedicated computers for use of filing a UI claim. Employment Services staff are trained on the process for UI claim filing by customers and provide direct assistance with customer questions about the general UI process. While Employment Services staff is not equipped to provide specific information on the customer's unemployment insurance claim, the One-Stop Centers focus on quality customer service and a streamlined customer experience.

One-Stop Center staff are trained on the NEworks system as a tool to provide Employment Services. The staff's strong knowledge and constant use of the system allows them to provide meaningful assistance to UI claimants as they use the system to file UI claims, register for work, and meet Nebraska's work search requirements.

Employment Services staff are cross-trained with UI staff and supervisors to have a better understanding of the claimants' experience and challenges when filing a UI claim. This information and shared experience provides the customer with as much assistance as possible, whether they are talking to Employment Services staff or UI staff.

C - Program Review Deficiencies

N/A

D – Program Deficiencies

N/A

E – Reporting Deficiencies

Federal Reporting — Data Validation Population reporting.

During FY2019 Data Validation Module 4 (Separations, Non-Separations, Appeals) and Module 3 (Benefits) were not submitted timely. Personnel retirement and departures created a gap in knowledge and understanding of the importance of timely reporting. Reporting reminders and deadline dates have been placed on electronic calendars with reminders to facilitate timely filing.

F – Customer Service Surveys

N/A

G – Other

N/A

In accordance with ET Handbook 336, 18th Edition, Change 3, NDOL instituted plans or measures to comply with SQSP Assurance requirements, as follows:

Assurance H – Assurance of Contingency Planning

NDOL has partnered with the State of Nebraska Department of Administrative Services Safety Emergency Preparedness Response Coordinator to update NDOL's current Contingency Planning framework into a comprehensive Continuity of Operations Plan which is a state-wide initiative covering all agencies of state government.

The plan was finalized in September of 2018. Essential staff training was conducted the week of October 15, 2018 and all involved parties engaged in a tabletop exercise in October2018. The complete COOP plan was finalized in December of 2018.

As of 2018, all IT Data Center operations have been transitioned to a Hot Site at the City of Omaha/Douglas County DOTCOMM data center. This second site is over 50 miles away from the state's primary data center to further protect assets and facilities in the event of a disaster.

NDOL also conducts scheduled inspections of the state Data Center, off-site storage, and disaster recovery site annually, in compliance with IRS Publication 1075 and NIST requirements to ensure security protocols are in place for the protection of information and information systems.

Assurance J - Assurance of Automated Information Systems Security

NDOL undergoes independent security assessments on IT systems at least every three years, leveraging Federal partners wherever possible.

In 2017, all major UI IT systems and IT Operational practices were inspected by IRS Safeguards as part of the agency's normal FTI inspection cycle. Findings for the systems are remediated as part of the agency POA&M.

Additionally, the State Auditor performs annual audits of NDOL's IT operations as part of normal auditing activity.

NDOL performs ongoing monitoring of all UI systems in accordance with documented policies and procedures. In 2015, NDOL participated in an independent risk assessment - a Cyber Resilience Review facilitated by the department of Homeland Security.

NDOL uses a variety of security tools including:
Veracode identifies software vulnerabilities across UI systems. This tool helps to prevent threats posed by hackers who are targeting software vulnerabilities to gain access to critical data. NDOL conducts a series of scans on UI systems, which provide categorized analytics to improve performance. NDOL uses the outcomes to mitigate application risk at the code level. NDOL's system security plan clearly defines procedures and timelines for conducting scans for risk management and audit compliance.

QRadar is used to collect a complete set of data from the IT environment for processing and analysis of relevant information from multiple dimensions, allowing NDOL to perform real time threat management. Logs are reviewed continually to detect and respond to breaches and threats.

Microsoft System Center Configuration Manger is used for remote control, patch management, software distribution, operating system deployment, network access protection, and hardware and software inventory capabilities.

NDOL's security team meets monthly to review the POA&M and discuss security-related projects or activities. Changing technology requires conscientious and steady assessment of the System Security plan. In strict compliance with legislation, regulations and other applicable requirements, NDOL is committed to compliance with NIST SP 800-53 Recommended Security Controls for Federal Information Systems and Organizations.

NDOL's security and risk assessment policy addresses purpose, scope, roles, responsibilities, management commitment, coordination among agency entities, and compliance; and procedures to facilitate the implementation of the risk assessment policy and associated risk assessment controls. The policy is reviewed and updated every three years and procedures are reviewed annually.

NDOL is awaiting budget approval to hire an Agency Security Officer who will manage security related requirements and train staff in NIST security and privacy controls for the protection of information and information systems.

4. *Corrective Action Plans (CAPs)*

CAPs are expected as a part of the SQSP when State's annual performance does not meet the established criteria for core measures, Secretary's Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

First Payment Promptness

State: Nebraska — Federal Fiscal Year: 2019-2020 SQSP Corrective Action Plan & Progress Report

Back to Regional Overview 2019 — Back to Alternate Overview 2020 — Instructions

Performance Measures	AIP	CAP Based on SQSP 2019 Performance Level	CAP Based on SQSP 2020 Performance Level	State's Target/Actual Performance	12/31/2019 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
First Payment Promptness: % of all 1st payments within 14/21 days after the compensable week	≥ 87%	92.0%	88.6%	Target:				84.50%	85.75%	87.00%	87.75%	87.50%
				Actual								
First Payment Promptness, 14/21 days intrastate UI full weeks	≥ 87%	92.5%	86.7%	Target:								
				Actual								

Regional Office Comments in cell below:

Corrective Action Plan Summary

The Summary Goal is to:

Alternate Year Plan Update:

A. The Reason for the Deficiency.

During FY 2019 timely first payments were impacted by the ongoing high workload.

With workload increases there was a continuing increase in the number of issues subject to adjudications, timeliness and lost separation only adjudication within the base period study, which has compounded the level of adjudication necessary to determine eligibility and first payments.

Along with an unusually workload level, the retention of staff within UI Benefits has impacted the adjudication process. Low unemployment rates statewide has resulted in and trained adjudicators moving to pursue other employment options. This has led to more number of inexperienced adjudicators and more time spent training new workers. Additionally, a number of long term UI staff has been either promoted to supervisory level, or to transfer to UBWA development and implementation processes.

Alternate Year Plan Update:

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities, aka, Milestones, include if requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

UI Program Supervisor and Program Research Specialist staff will develop and conduct additional training programs in areas of issues and non-separation adjudications in addition to training new staff and transitioning a new Benefit Payment System.

Alternate Year Plan Update:

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance, and, an explanation of why the actions now specified will be more successful.

This is the first year of this plan.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

All management staff will provide assistance and mentoring to adjudicators each quarter. Ongoing training sessions are conducted based on quarterly BTQ results.

Additional staffing needs will be reviewed on a quarterly basis as need.

Alternate Year Plan Update:

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the current fiscal years (the two consecutive fiscal years for which the plan is in effect). Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

(Remaining Major Actions in 100 char.)

Milestones

	Completion Date
UI Modernization - Implementation of new benefit payment system. Scheduled Deployment 10-01-2019	Multi-year

Quarter 1 status report (12/31/2019):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

	Completion Date
Hire and train additional staff to meet the increased workload	6/30/2020

Quarter 1 status report (12/31/2019):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

3. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

4. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

5. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

6. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

7. [Enter next milestone here]	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

Improper Payments Measure

State: Nebraska

Federal Fiscal Year: 2019-2020 SQSP Corrective Action Plan & Progress Report

Back to Alternate Overview 2019 | Back to Alternate Overview 2020 | Instructions

Performance Measure	ALP	CAP Based on 2019-2018 Performance Level	CAP Based on 2020-2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Improper Payments Measure	< 10%	11.11%	11.29%	Target	11.00%	10.90%	10.40%	9.40%	9.00%	9.00%	9.00%	9.00%
				Actual	14.00% (12/31/2018)							

Regional Office Comments in cell below:

Corrective Action Plan Summary:
The Summary must provide:

Alternate Year Plan Updates

A. The Reason for the deficiency.
Delay or inevitable work search requirements and wages earned by claimant. Lag time between return to work and earnings reported by employer.
Alternate Year Plan Updates

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities, aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Increase staff and public messaging on eligibility issues and procedures and completing existing IT projects to increase BYE detection. Focus on staff performance and target training to remediable issues and increase detection effectiveness.
Alternate Year Plan Updates

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance, and, an explanation of why the actions now specified will be more successful.

Prior plan years focused on leveraging technology to create solutions to improper payments. While the technological upgrades Nebraska has implemented in the last two years have strengthened agency systems and controls.
Alternate Year Plan Updates

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for correcting quality after achieving performance goals.
The agency will meet quarterly with RAM managers to review issues and gaps from backlog of reviewing the improper payments before they impact detection methods. Our team evaluates the RAM and UI personnel and recommend for new areas and best as best practices for gains.
Alternate Year Plan Updates

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the current fiscal years (the two consecutive fiscal years for which the plan is in effect). Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.
Remaining Major Actions in the cell

Milestones

	Completion Date
1. Nebraska will continue to refine the method and data flow for cross-match between Unemployment Insurance claims and the Department of Motor Vehicles, DMV, for use in discovery of Identity Theft. The cross-match can be used to verify claimants by name, address of record, etc. This will include DMV photos for use in possible prosecution cases. Currently staff must research each claimant singularly. The system will be program to review anomalies and automatically run the cross match report. Staff will have a list for review instead of relying on tips and leads for discovery of identity theft.	

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

	Completion Date
2. Nebraska will continue to cross-match Unemployment Insurance claims and Vital Statistics for use in discovery of Identity Theft and fraud claims.	

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

3. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

4. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

5. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

6. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

7. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

Benefits Data Validation

State: Nebraska

Federal Fiscal Year: 2019-2020 SQIP Corrective Action Plan & Progress Report

Back to Biennial Overview 2019 | Back to Alternate Overview 2020 | Instructions

Performance Attribute	ALP	SQIP Benefits SQIP 2019 Performance Level	State's Population Performance	10/01/2018 Quarter 1	1/01/2019 Quarter 2	4/30/2019 Quarter 3	8/30/2019 Quarter 4	12/01/2019 Quarter 5	2/01/2020 Quarter 6	4/30/2020 Quarter 7	9/30/2020 Quarter 8
Data Validation Benefits - All Submitted and Passing	Submitted & Passing	Population 1	Target	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
		Failed	Actual	Submitted 01/14/2019 Failed							
		Submit & Pass	Target	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
		Failed	Actual	NS 2018							
		Submit & Passing	Target	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
		Failed	Actual	NS 2018							

Regional Office Comments in cell below:

Corrective Action Plan Summary:

The Summary must provide:

Alternate Year Plan Update:

A. The Reason for the deficiency.

Failure related to two distinct issues. Data discrepancies in Population 1 and failure to submit the remaining populations. Further, Population 1 failed due to having no validations in the first quarter with sporadic instances. The Modernization will address some of the issues.

Alternate Year Plan Update:

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities, aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Will continue to work with the BPR team and on the UWBA data issues.

Alternate Year Plan Update:

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

Will continue to work with IT personnel to develop, test and implement joining multiple year technology testing issues in reporting. This should not be achieved with our upcoming modernization scheduled to go live in 2020.

Alternate Year Plan Update:

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Monitoring and support the BPC-Data Integrity Workgroup that will monitor and assess the ongoing problem of ETA 227 data.

Alternate Year Plan Update:

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the current fiscal years (the two consecutive fiscal years for which the plan is in effect). Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

(Measuring Major Actions in the UI.)

Milestones	Completion Date
1. Created new internal process for completion of 227 report to simplify data gathering that helped ensure more accurate reporting and consistent process	
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	
2. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	
3. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	
4. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

5. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

6. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

7. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2018):	
Quarter 2 status report (3/31/2019):	
Quarter 3 status report (6/30/2019):	
Quarter 4 status report (9/30/2019):	
Quarter 5 status report (12/31/2019):	
Quarter 6 status report (3/31/2020):	
Quarter 7 status report (6/30/2020):	
Quarter 8 status report (9/30/2020):	

5. *UI Program Integrity Action Plan (UI IAP)*

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

UI Integrity Action Plan (IAP)

Back to Biennial Overview 2019 | Back to Alternate Overview 2020

State	Federal Fiscal Year	Accountable Agency Official(s):	
Nebraska	2020	Rita Thurber, Acting UI Director	
	Top Three Root Causes (Calendar Year 2018)	Calendar Year 2017 (% of $ Overpaid)	Calendar Year 2018 (% of $ Overpaid)
Root Cause Alternate Year #1:	Work Search	52.07%	48.14%
Root Cause Alternate Year #2:	Separation Issues	7.91%	10.88%
Root Cause Alternate Year #3:	Benefit Year Earnings	18.28%	8.82%

Summary: (Provide a summary of the plan that the state has designed. The summary should include outreach efforts planned by the agency to inform all UI and workforce staff, and employers of the strategic plan to ensure everyone understands the importance of maintaining program integrity.)

Increased workload and staffing shortages continue to negatively influence preformance in UI Benefits. With workload increases there was a continuing increase in the number of issues subject to adjudication. Along with an unusually workload level, the retention of staff within UI Benefits has impacted the adjudication process. Low unemployment rates statewide has resulted in well trained adjudicators leaving to pursue other employment options. This has led to lower number of experienced adjudicators and more time spent training new workers.

Additionally, a number of long term UI staff has been either promoted to supervisory level, or is leaving for UIMA development and implementation purposes. Modernization and new technologies will address some of the performance issues, but issues associated with transitioning to a new software platform and have a large percentage of new staff (as of this writing, 75% if adjudicators had less that six months experience), are expect to face a number of new challenges over the next few years.

Instructions for the following section: In each individual section below, enter a Root Cause, from above, and the top three focused Strategies that will be employed to correct or reduce this cause of overpayments. An additional line is available in each section to include other significant strategies that target the root cause.

Root Cause Alternate Year #1: Work Search

Strategies	Actions	Targets & Milestones	Resources
Increased messaging for work search prior to and during the weekly certification process.	Messaging will address the eligibility requirements to the claimant and advise the claimant of the necessary steps to accurately conduct and report work search contacts. Developing Work Search Guidance document with legal to help clarify for claimants what constitutes a valid work search contact.	Social Media and Website messaging will accompany UI Modernization October 2019 Release of finalized Guidance Document June 2020	UI staff, IT staff, PIO, Legal
Continued convening of the UI Improper Payment Cross Functional Task Force	Continue assembly of the Improper Payment Cross Functional Task Force (IPCFTF) on a quarterly basis to enhance agency knowledge and participation in Everyone Owes Integrity Campaign and to evaluate the impact on OUS deployment (UI Modernization)	Quarterly meetings of primary contacts from high-level management across the agency and from line employees in UI Benefits and Tax. Review data in February, May and August. Re-evaluate strategy in 3rd Quarter of 2020 and outline successes and opportunities for improvement.	IT, UI and CS personnel. Representatives as determined by the Office of the Commissioner of Labor
Review of developed practices and Program wide development and enhancement of Training Manual materials specifically addressing improper payments.	With the deployment of new UI Benefits software program Nebraska will monitor and review staff in the Benefit Payment System and develop best practice standards for individual use and training of all staff.	Monitor staff determination data quarterly beginning in January 2020. Develop best practices in quarterly reviews.	UI Benefits staff and managers, Legal Counsel, BAM staff, IT staff as appropriate
Additional:			

Root Cause Alternate Year #2: Separation Issues

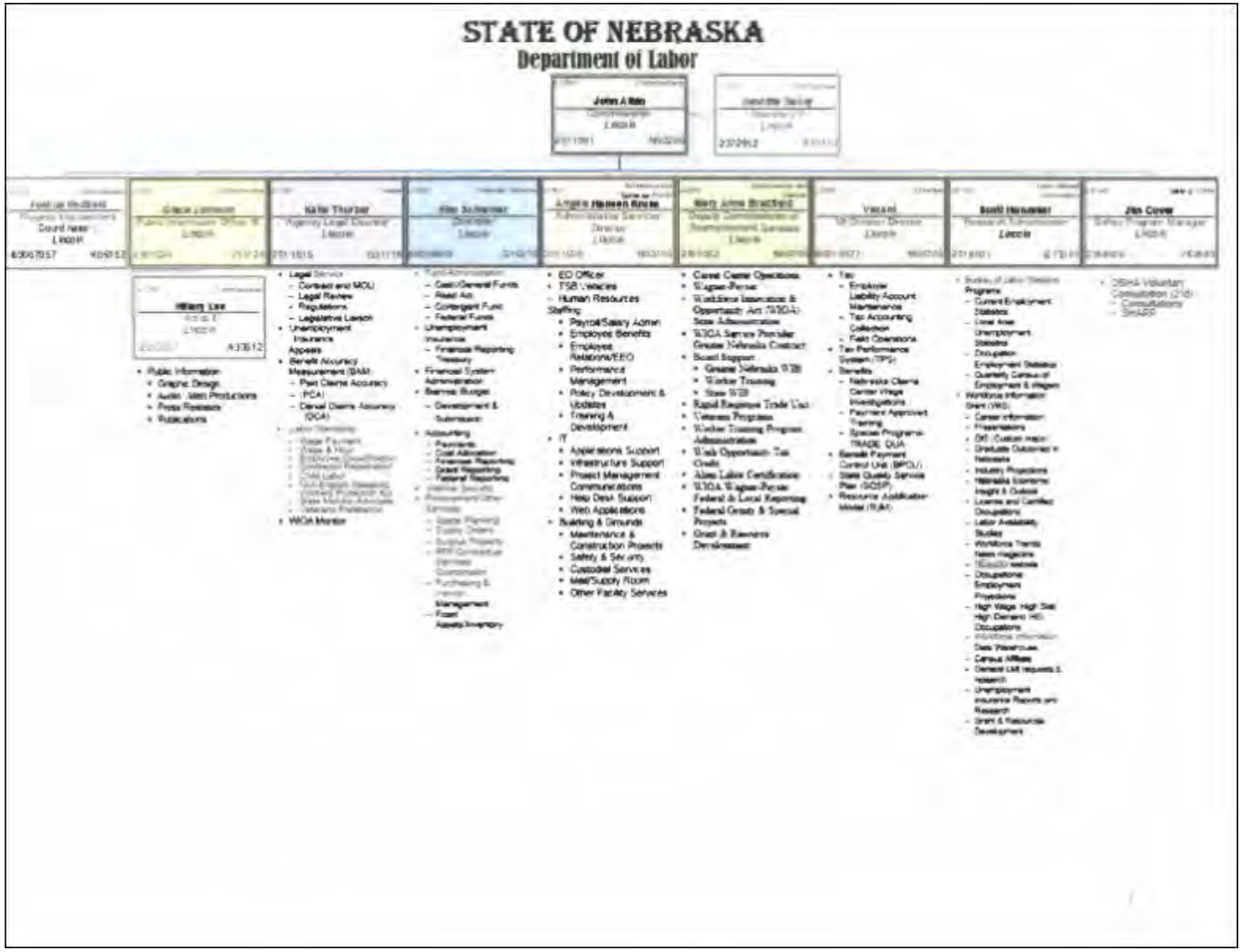
Strategies	Actions	Targets & Milestones	Resources
UI Modernization with better SIDES/ of Graphic Solution Unemployment Systems (GUS) integration employer will provided an opportunity to submit more detailed separation information.	Moniter adjudication timeliness and accuracy over the course of the new software deployment.	SIDES/GUS integration begins in October 2019. Weekly, Monthly, Quarterly reviews of performance of both software and staff.	IT personnel, Claims and Adjuication Supervisors BPC staff and BAM Unit.
Claim specialist and ajudicator training associated with application of Nebraska Employment Security Law (NESL).	Continue regular trainings with each group with new hires and refresher courses with other adjudicators. Supervisors and veteran staff will provide additional coaching. A better understanding of the applicable NESL should lead to faster and more accurate adjudication of claims	New hires began training on September 3, 2019 and will continue as GUS is deployed. Weekly, Monthly, Quarterly reviews of staff performance.	UI Program Resource Specialist, Claims and Adjuication Supervisors BPC staff and veteran adjudicators
Claim specialist and ajudicator training associated with new software.	Prior to the deployment of GUS, training specialist from of Graphic Solution provided four weeks of training on the new software. UI Program Resource Specialist, supervisors and veteran staff will provide instruction and coaching of "best practices" A better understanding of the applicable NESL should lead to faster and more accurate adjudication of claims	Application training began August 27, 2019 and will continue as GUS is deployed. Weekly, Monthly, Quarterly reviews of staff performance.	Graphic Solution trainers, Claims and Adjuication Supervisors BPC staff and veteran adjudicators
Developed enhanced training materials and specialized reference materials addressing seperation issues **Additional:**	With the deployment of new UI Benefits software program, Nebraska will ensure claims specialists and adjudicators have up-to-date resource materials and provide regular updates as needed.	Provide new materials with deployment of new software in fall of 2019 No date specific. Practice is ongoing	UI Program Resource Specialist, Claims and Adjuication Supervisors BPC staff and veteran adjudicators

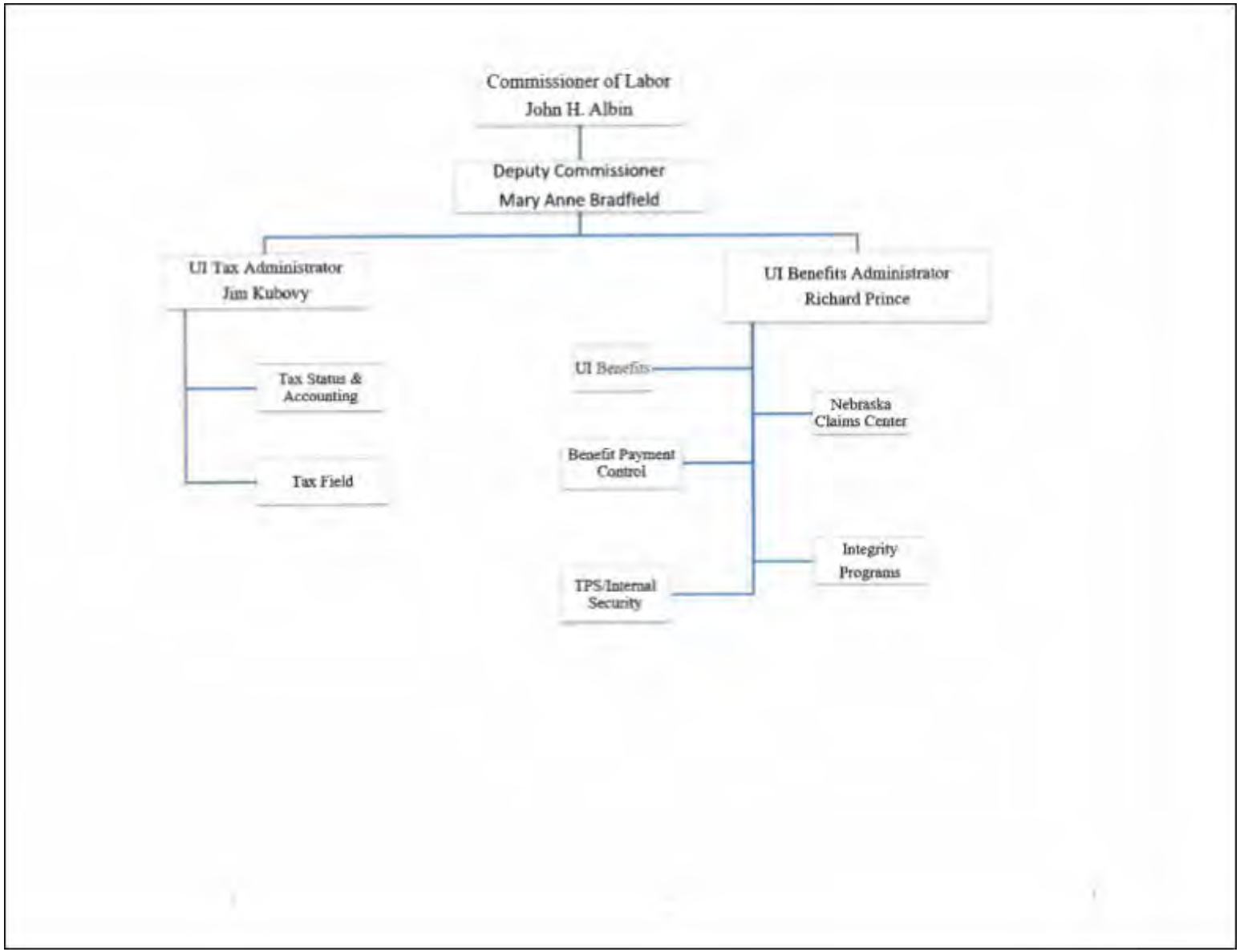
Root Cause Alternate Year #3: Benefit Year Earnings

Strategies	Actions	Targets and Milestones	Resources
Prevention of Fraudulent claims by Identity Theft and to build stronger cases for prosecutions by development of a cross match with the Department of Motor Vehicles.	DMV cross match enhances verification of claimant's information in cases from possible Identity Theft.	Ongoing	IT personnel, Legal Counsel, BPC staff, Interface with Department of Motor Vehicles personnel
Prevention of false claim and improper payments by development of a cross match with Nebraska HHS Vital Statistics Department	The Vital Statistics cross match enhances verification of claimant's information including date of birth, marriage or divorce for name changes, and date of death.	9/30/2019	IT personnel, Legal Counsel, BPC staff, Interface with DHHS Viral Statistics personnel
Prevention of Improper payments by review of New Hires audit practices.	Review of current policies and procedures for timely handling of Nebraska and National New Hires audits.	Weekly managerial review of New Hire audit data and development of internal policy	BPC staff, UI Managers.
BPC Audits: Development of Training Manual and best practices for the New Benefit Audit Tracking System (BATS) in the BPS program	The current Benefits Investigation Tracking System (BITS) in BPS program has changed the flow of how BPC staff handles the investigations information. This flow moved from an offline, manual orientation into an online ability that quickly assesses and impacts claimant fraud. Nebraska will monitor and review staff in the new system and develop best practice standards for individual use and for training of new staff.	Development of procedural and training materials, (Ongoing) Ongoing analysis of BATS effectiveness and best practice standards	BPC staff, BAM staff, UI managers, Benefits staff, IT staff
BPC Audits: Receiving data and addressing issue more timely **Additional:**	Shorten time span on time when cross-match audits are sent from 30/60/90 days to 15 day first notice and 15 day 2nd notice then phone call	Ongoing analysis of impact to shortening intervals for effectiveness	BPC staff, IT Staff, UI Managers

6. Organizational Chart

The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.




Commissioner of Labor
John H. Albin
Deputy Commissioner
Mary Anne Bradfield
UI Tax Administrator
Jim Kubovy
UI Benefits Administrator
Richard Prince
Tax Status & Accounting
Tax Field
UI Benefits
Nebraska Claims Center
Benefit Payment Control
Integrity Programs
TPS/Internal Security

7. SQSP Signature Page

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines. Though a State needs to submit the complete SQSP package on a 2-year cycle, there are certain documents contained in the SQSP package which are required to be submitted by States annually as part of the off-year submission. The documents which are required to be submitted annually are considered a modification to the complete SQSP submitted the previous year. Since funds for State UI operations are appropriated each year, each State is required to annually submit the transmittal letter, budget worksheets, organizational chart and the signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. Since the UI program is a required one-stop partner, States have the option of including UI in the Combined State Plan authorized by WIOA sec. 103.

U.S. Department of Labor

SQSP SIGNATURE PAGE

OMB Control No.: 1205-0132 Expiration Date: 02/28/2021

U.S. DEPARTMENT OF LABOR Employment and Training Administration	**FEDERAL FISCAL YEAR** **FY2020**	**STATE** **Nebraska**

UNEMPLOYMENT INSURANCE
STATE QUALITY SERVICE PLAN
SIGNATURE PAGE

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and

NEBRASKA
(STATE'S NAME)

The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

TYPED NAME AND TITLE	SIGNATURE	DATE
STATE ADMINISTRATOR **John Albin**		9-2019
DOL APPROVING OFFICIAL **Christine Quinn**		9/26/19
DOL APPROVING OFFICIAL		

b. Requirements for States electing to include UI in the Combined State Plan

States that elect to include UI in the Combined State Plan must:

1. *Submit an SQSP in the following manner depending on their timing in the SQSP cycle:*

   A. *If a State is in the first year of their 2-year cycle, the State is required to submit the most recently approved complete SQSP package. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.*

Nebraska is in the 2nd year of the two year cycle.

   B. *If a State is in the second year of the 2-year cycle, the State is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.*

2. *Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year*

Senior Community Service Employment Program (SCSEP)

(OMB Control No. 1205-0040)

a. Economic Projections and Impact

1. *Discuss long-term projections for jobs in industries and occupations in the State that may provide employment opportunities for older workers. (20 CFR 641.302(d)) (May alternatively be discussed in the economic analysis section of strategic plan.)*

The long-term projections for jobs in industries and occupations in Nebraska that may provide employment opportunities for older workers is discussed in the economic analysis section of the strategic plan portion in the common section of the Nebraska's Combined State Plan.

2. *Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))*

The State Department of Labor data offers the top 10 state occupations that have above average job prospects. Occupations addressing our aging population's long-term care support needs are prominently featured.

Table 58. 2016 – 2026 Occupational Projections Top 10 Most Annual Openings for Postsecondary Non-degree Award Education Level with Entry Wages from the Occupational Employment Statistics Survey

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual Openings	Entry Wage
29-2061	Licensed Practical and Licensed Vocational Nurses	477	$16.86
29-2071	Medical Records and health Information Technicians	137	$14.33
31-1014	Nursing Assistants	1,851	$11.17
31-9091	Dental Assistants	292	$13.74
31-9092	Medical Assistants	454	$12.37
39-5012	Hairdressers, Hairstylists, and Cosmetologists	519	$10.25
49-3023	Telecommunications Equipment Installers and Repairers, Except Line Installers	145	$16.02

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual Openings	Entry Wage
49-3023	Automotive Service Technicians and Mechanics	521	$12.35
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	281	$15.80
53-3032	Heavy and Tractor-Trailer Truck Drivers	3,438	$15.49

Source: Nebraska Department of Labor, Office of Labor Market Information July 2018 Wages from Occupational Employment Statistics, 4th quarter 2017

The State Department of Labor notes that the most common job vacancies are for Health, Transportation, and Material Moving occupations. Some of the most common job vacancies, such as medical and dental assistant, match the interest of some women over 55 years of age seeking employment. The Senior Community Service Employment Program's (SCSEP) host agencies provide the location and the skills training to support participants' development of job skills for meeting their goal of locating a position in the workforce. Currently, office work, customer service/call-center and retail are the most common types of training opportunities offered through Nebraska host agencies. Nebraska SCSEP will work towards aligning the training with the top job openings in the state. Skills gained in office work and customer service settings are transferrable to some of the top occupations listed such as in healthcare settings. However, it should be noted that some of the top openings such as truck drivers are not ideal for the 65 and older population the program serves under a priority.

Host agency training may need further supplementation by SCSEP subgrantee and the Workforce Innovation and Opportunity Act (WIOA) partners to provide local employers with job-ready employees which relate to the goal of aligning with career pathways. The office jobs currently available require a working knowledge of computers. This technological experience is often underdeveloped in persons over 55 years of age. The SCSEP will negotiate host agency agreements that provide participants computer training. A Customer Service and Support Training component which is part of the National Retail Federations will focus on meeting customer needs, establishing clarity and continuous improvement. Companies such as PayPal, Facebook and Amazon have a presence in the populated part of the state where SCSEP has a significant number of slots. Nebraska's subgrantee is developing a curriculum for a call center training that can be used by employers to train participants as well as a targeted curriculum for office technology skills. Participants whose Individual Employment Plan (IEP) and assessment results align with the top occupations projected for growth will be enrolled in these trainings. Additionally, basic computer skills training will be made available to all participants starting in 2020 via a new online training platform. As current participants exit, Nebraska SCSEP will try to enroll new participants whose employment goals and assessment results support placement in healthcare and personal service occupations listed above. New host agencies in these occupations will be recruited and OJE opportunities will be explored in the top occupations.

3. *Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))*

The current and projected employment opportunities in Nebraska are discussed in the economic analysis section of the strategic plan portion of the Nebraska Combined State Plan. Table 13 in the economic analysis section of this plan identifies education and job training requirements for the current and projected top 20 demand occupations in the state. Table 59 identifies seven occupations among the top 20 projected to grow in Nebraska that specifically correspond with the employable positions for older workers in our state.

Table 59. 7 Occupations among the Top 20 Occupations Projected to Grow in Nebraska for Older Nebraska Workers

Occupation	Required training
Food Preparation and Serving Workers	Short-term On-the-Job Training (OJT)
Personal Care Aides	Short-term OJT
Janitors and Cleaners	Short-term OJT
Customer Service Representatives	Short-term OJT
Laborers, Material Movers	Short-term OJT
Retail Sales Persons	Short-term OJT
Stock Clerks and Order Fillers	Short-term OJT

The skills possessed during their prior work experience can be transferrable by placing them in a well-matched training assignment based on an assessment of their education and skills. The type of skills an individual should possess in order to become employable also include soft skills such as dependability, commitment to doing quality work and good customer service orientation.

The SCSEP sub-grantee must conduct a thorough evaluation of the participant's skills, work experience, and identify the barriers to employment during the participant assessment and develop an Individualized Employability Plan or IEP to help guide job coaches in targeting the skills the participant needs to enhance in order to obtain unsubsidized employment.

Table 60 summarizes the participant demographics for Nebraska for PY 2018 including the education skill level (Nebraska has only one sub-grantee). Almost half the participants have a high school diploma and 22% have some college education. This educational level corresponds to the education required for the occupations listed above.

Table 60. Participant demographics for Nebraska for PY 2018 including the education skill level

Participant characteristics	State %
Male	50
Female	50
Age at enrollment: 55-59	36
Age at enrollment: 60-64	28
Age at enrollment: 65-69	16
Age at enrollment: 70-74	14
Age at enrollment: 75 and over	7
Ethnicity: Hispanic, Latino or Spanish Origin	6
Ethnicity: American Indian or Alaska Native	2
Ethnicity: Asian	3
Ethnicity: Black or African American	43
Ethnicity: Native Hawaiian or Pacific Islander	0
Ethnicity: White	48
Ethnicity: Two or more races	2
Education: 8th grace and under	7
Education: 9th grade – 11th grade	11
Education: High school diploma or equivalent	49
Education: 1 – 3 years college	22
Education: Postsecondary certificate	1
Education: Associate's degree	2
Education: Bachelor's degree or equivalent	8
Education: Some graduate school	0
Education: Master's degree	0
Education: Doctoral degree	0
Family income at or below the poverty level	83
Individuals with disabilities	23
Individuals with limited English proficiency	7
Individuals with low literacy skills	4
Individuals residing in rural areas	18
Individuals with low employment prospects	96
Veterans (or eligible spouse of veteran)	21

Source: SCSEP Performance and Results Quarterly (SPARQ) system for PY 2018

b. Service Delivery and Coordination

1. *A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:*

    A. *Planned actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA one-stop delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e))*

The development of Nebraska's Senior Community Employment Program State Plan, as a chapter of the Combined State Plan, involved the insight and participation of a variety of interested persons and groups. This planning process involved multiple steps and opportunities for various opinions to impact the plan. A brief summary includes:

1. The State grantee developed the framework and initial draft of the State Plan following a strategy session held for WIOA partners and workforce development board members. The strategy workshop was facilitated by

professionals from the University of Nebraska-Lincoln. In addition, the State SCSEP coordinator and the State Unit on Aging Administrator attended multiple webinars and meetings held by the workforce development agency to develop goals and strategies for the common portions of the combined state plan. The Nebraska state grantee worked with other workforce partners in developing the common areas of this plan using the Provus Discrepancy Model that included 5 phases of development.

2. Nebraska's Title V program includes subgrantee, National Able Network which operates in 77 counties. National Able Network recruits, locates community service training, and helps program participants locate unsubsidized jobs. National Able Network is co-located at the American Job Centers (AJC) /one-stop centers in the state and has memoranda of understanding with all three workforce development boards in the state.
3. State Department of Labor and workforce development partners provide job-search and work-skills development. The Department of Labor collaborates with the Departments of Economic Development and Education including Vocational Rehabilitation to develop a strategic approach to developing a local workforce with the skills needed for current jobs as well as future opportunities. The Department of Labor provides a wide variety of support services for job seekers. Their workforce development activities include job-training for adults. Some SCSEP participants receive additional training through this program.
4. Workforce development partners are regional agencies which work with schools, employers and other training partners to provide necessary skills training for persons seeking employment. The Nebraska Senior Community Service Employment Program is an active partner in the WIOA One Stop Centers/American Job Centers. Some SCSEP participants also benefit from training opportunities available at the One-stop Centers where the centers serve as a host agency. Nebraska SCSEP works closely with the Vocational Rehabilitation Program to exchange referral of applicants. A Common Intake System has been developed to facilitate the referral process with various partners however it is not fully functional statewide yet.
5. Area Agencies on Aging provide a wide variety of support services to help persons over 60 years of age live independently within their communities. SCSEP participants often have significant constraints limiting their ability to find and keep a job. Addressing factors such as affordable housing, transportation and caregiver support are necessary also. Their familiarity with community supports makes Area Agencies on Aging important partners with the Nebraska Senior Community Service Employment Program.
6. Community service organizations provide training to SCSEP participants. These organizations range from senior service organizations, such as senior centers, to community services including schools and hospitals.
7. Nebraska's sub-grantee, National Able Network serves as the One-stop Operator in Omaha. This has made the coordination between the one-stop center and the SCSEP much more efficient and conducive to placing participants in training at the AJC.

Nebraska SCSEP participates in events held at the one-stop centers such as job fairs, career days and employer-focused on-site visits. Other events such as presentations by county correctional services on transitioning ex-felons to employment with this target group being considered under the OAA reauthorization bill.

Nebraska is a vast geographic area of 76,358 square miles which means that technology is critical in coordinating services among programs and in providing services to employers and job seekers. To enhance coordination and communication, SCSEP will partner in the Combined State Plan to utilize a single case management and Management Information System. This technology is called NEworks. NEworks is a powerful online labor exchange system that integrates workforce services with job seeker and employer candidate recruitment.

Nebraska has a NEworks mobile App available for job seekers to view jobs located near them with the "Job Nearby" feature, search for jobs by company, job title, and location, save their favorite jobs, share jobs via email, Facebook, or Twitter and access Nebraska's most comprehensive resource for full-time and part-time jobs.

The SCSEP program will collaborate with workforce development partners in developing sector strategies that focus on industries essential to the economic vitality of the state's regions. Supporting the businesses to offer employment opportunities to Nebraskans 55 and over who are structurally unemployed with barriers to employment such as low income, homeless, and other disadvantaged populations will be critical for the SCSEP. In keeping with the strategy identified in this state plan, the SCSEP will focus on customer service training programs and partner with local employers for apprenticeship-style training to support the overall goal of this plan. The SCSEP will be lock-step with the 12 other partners in this state plan to implement the strategies including coordinating services to maximize benefits of the participants and identifying technology resources to integrate all supportive services.

Some of the top 10 jobs with the most number of projected openings are not suitable for the SCSEP-eligible population, such as heavy truck drivers, machinists and nurses, National Able Network is in the preliminary stages of developing an apprenticeship model for careers in call center occupations and thereby promote the strategy of developing career

pathways. These jobs feed into the top career fields identified in this state plan. National Able Network is working on a curriculum for their call center at their Chicago headquarters to formalize the training for participants. They plan to seek employers who allow work from home call center operations (this is ideal for rural participants), and adapt the training to their needs. This will likely lead to the development of a certified training program.

Career Pathways is a strategy that will support the Nebraska vision and goals for workforce development. In 2008, the Nebraska Department of Education/Career Technical Education adopted and implemented the National Career Pathway Model developed by the Office of Vocational and Adult Education. The model includes six career fields: 1) Business, Marketing & Management; 2) Agriculture, Food, and Natural Resources; 3) Communication and Information Systems; 4) Human Services and Education; 5) Health Sciences and 6) Skilled and Technical Sciences. The six career fields entail several professions and jobs. Career Pathways is discussed in further detail under State Strategies in the Combined State Plan.

B. Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))

The SCSEP will coordinate with the area agencies on aging, senior centers and other community organizations on activities carried out under other titles of the Older Americans Act (OAA). Collaboration with these agencies will include recruitment of new participants, establishing host agency sites with the agencies and integrating the SCSEP in other agency services under the Older Americans Act. This includes collaborating with the Aging and Disability Resource Center (ADRC) with a SCSEP presence on the ADRC website (ADRCNebraska), collaborating with transportation services provided by the agencies for SCSEP participants that need supportive services and working with agencies that serve minorities including Native Americans under Title VI of the OAA. The aging network familiarity with community supports makes the Area Agencies on Aging important partners for the Nebraska SCSEP. Specifically, the grantee will carry out the following activities under OAA:

1. Share information and resources related to seniors' employment needs, support services to help remove barriers to employment and performance results with the State Advisory Council.
2. Explore opportunities to collaborate with the Office of Health Disparities and Health Equity, the State Latino Commission, the agency for the deaf and hard of hearing and other agencies in an effort to serve rural and minority populations.
3. Attend Area Agencies on Aging (AAAs) training when feasible.

C. Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith- based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))

To meet the basic support needs outside of training for employment, provide training to match older worker's employment goals, and matching older workers with local employers will require coordination with a number of organizations. These organizations include human services, employment and training agencies and employers.

The inadequacy of basic supports such as housing, transportation, and possible care needs of a frail spouse or parent will lower a SCSEP participant's chances of completing training, finding and keeping a job. Human service organizations such as the Nebraska Aging & Disability Resource Centers, the Nebraska Department of Health and Human Services and Area Agencies on Aging will be central to addressing these basic support needs.

The Department of Health and Human Services (DHHS) offers a wide variety of supports to help maintain individuals within their community. Specific programs which address common support needs include the Social Services Block Grant, Disabled Persons and Family Support, Lifespan Respite, and Medicaid Waivers. A sampling of possible support services includes: transportation, energy assistance, housing and telephone assistance, Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps), adult day care for caregivers and covering the Medicare premiums for eligible low-income beneficiaries. The SCSEP will use the 2-1-1 and other support organizations such as Easter Seals, the Arc of Nebraska to identify individuals with disabilities.

The SCSEP will work with the other state plan partners in researching and identifying technological resources to integrate all supportive services. This strategy is discussed in the common section of this state plan.

The local Area Agencies on Aging are familiar with the support needs of the elderly and are experienced in organizing community resources to address those needs. As stated earlier, Nebraska currently has one program sub-grantee, National Able Network. National Able Network is also a national grantee whose service area covers most of Nebraska. National Able Network confers with the staff of each of the eight Area Agencies on Aging to address non-employment support needs of SCSEP trainees. This partnership will be able to provide information to address a variety of human services as well as a referral to local agencies which provide assistance to the targeted population. The ADRC website provides linkages to a wide variety of community resources for the SCSEP participants. For more information visit ADRCNebraska.

One significant barrier to employment is an inadequate availability of public transit. The Senior Transportation Coalition is coordinated by the Nebraska Easterseals and Nebraska AARP. Nebraska efforts have focused on the development of local coordinated transportation initiatives and regional coordinated transportation systems. Interest in this initiative has come from human service, transportation providers and State agencies (Departments of Health and Human Services, Labor, Roads and the Public Service Commission) and indicates a continuing commitment to improve the availability and effectiveness of public transportation services. Participants living in Douglas and Sarpy counties may be eligible for the Lyft 2-1-1 transportation program made possible by a grant from the United Way of the Midlands.

Affordable housing is necessary to rebuild or maintain the economic life of program participants. Housing issues range from locating affordable housing to accessing community supports such as energy assistance and weatherization. Both Area Agencies on Aging and Community Action Programs are familiar with available affordable housing resources. The Lincoln and Omaha Housing Authorities are a key partner in addressing issues related to homelessness and serve as a host agency. Program participants are often caregivers for a parent, spouse or grandchild. The Nebraska Lifespan Respite Program, Care Management Program and the Older Americans Act Caregiver Support Program assist these caregivers. The Area Agencies on Aging are partners with the Lifespan Respite Program. The Area Agencies on Aging provide Care Management and operate Caregiver Support Programs. Additionally, the State SCSEP Coordinator serves on the Nebraska Caregiver Coalition and is a member of the Caregiver Advisory Board. This helps facilitate coordination between SCSEP and caregivers in the state.

This older worker initiative focuses by design on an economically at-risk population. As noted elsewhere, 85% of participants have incomes below the poverty level, 62% receive public assistance benefits and 87% are at-risk of homelessness. A functional partnership between SCSEP, local aging, housing and community service organizations is necessary to address multiple needs of the program's participants.

The State Unit on Aging has worked with National Able Network to maintain functional partnerships within the WIOA system. The Nebraska grantee and sub-grantee are active with the local One-Stop Centers. This includes participation on Workforce Development Boards (WDB) and their committees. The sub-grantee has current Memoranda of Understanding and Infrastructure and Cost Share Agreements with the three WDBs.

The Nebraska Partner Council will continue to work together to find skill gap solutions, resource solutions, work readiness solutions and other innovative workforce solutions. The Partner Council will receive timely and valuable information from the Industry Councils and local and regional employer representatives on work and skill readiness needs. The State SCSEP Coordinator's participation on the Partner Council will help ensure that subpopulations and minority populations are being afforded good work opportunities and employers have a diverse and ready workforce. The Partner Council was restructured to form 3 subcommittees of the state workforce board. State SCSEP Coordinator serves on the Evaluation and Review Subcommittee along with some state workforce board members.

D. Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

SCSEP will coordinate with labor market and job training initiatives in the state to promote access and distribute essential information to individuals 55 and over facing barriers to employment. For those wishing to investigate training options and approved training providers, a self-service web-based tool that displays Workforce Innovation and Opportunity Act approved training programs is available on the NEworks website. Through this tool, users will be able to access the statewide list of eligible training providers and their performance information.

E. Actions to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and improve coordination with the one-stop delivery system. (20 CFR 641.335)

The Nebraska SCSEP is an active partner in the WIOA One Stop Centers/American Job Centers. The SCSEP has worked with the WIOA system in developing a common intake system and has participated in joint planning sessions with WIOA core partners in building a system approach to delivery of services. As a mandatory one-stop partner, the SCSEP grantee will continue to participate in the state and local Workforce Development Boards to work on program alignment, system building and service delivery and design/coordination. All of the sub-grantees' offices are co-located with American Job Centers/one-stop centers and collaborate with them. This helps strategically serve the needs of SCSEP participants in finding unsubsidized employment. The SCSEP participants will have access to online resources at the one stop centers. The sub-grantee is now the One-stop Operator in Omaha which includes the largest number of SCSEP slots in the state. The One-stop center serves as a host agency for SCSEP participants.

The Nebraska Department of Labor provides a wide variety of support services for job seekers. Their workforce development activities include job training for adults. The SCSEP will coordinate the development of OJEs with the Department of Labor OJT program to enhance job development initiatives with employers. One of the strategies listed in this state plan is to undertake efforts to *integrate supportive services of partners. The SCSEP will benefit from this initiative.*

F. Efforts to work with local economic development offices in rural locations.

The Nebraska sub-grantee will continue to build partnerships with local economic development offices in rural areas. This will be a critical strategy as Nebraska moves SCSEP positions from urban centers to rural areas. Local collaboration will be enhanced with the five economic development field offices as well as with the Latino Business Office in the Department of Economic Development. The SCSEP participants can feed into the jobs created by the Rural Development Advantage program available to businesses in rural areas. The SCSEP will support the economic development initiatives, Next Generation Partnerships and Blue Print Nebraska outlined in the common section under III.2.H of this plan.

2. *The State's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the State strategies section of strategic plan.)*

The Nebraska long-term strategy to engage employers to develop and promote opportunities for placement of SCSEP participants in unsubsidized employment is discussed elsewhere in this plan. The NEworks, Nebraska Career Connections, and Career Links websites contain resources specific to employers. The SCSEP will continue to expand OJE opportunities with employers for the SCSEP participants. One of the strategies in the state plan is to scale public-private partnerships that create internships, apprenticeships, and customized workforce solutions. The SCSEP is already looking into customized training for call center jobs with specific employers in mind. Employer outreach will be enhanced with television and radio advertisements highlighting the value of the SCSEP. The SCSEP will coordinate employer incentives such as tax credits, incumbent worker training program and Nebraska Advantage Program to encourage employers to place SCSEP participants in jobs.

3. *The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))*

The Nebraska long-term strategy for serving minority older individuals under SCSEP will include ongoing collaboration with agencies serving the minority population such as the Latino Centers and Migrant Seasonal Farmworkers, utilizing television and radio ads in Spanish and Vietnamese and continued use of printed materials in Spanish. The SCSEP will proactively seek the Intercultural Senior Center, the Asian Community Center, Ponca Housing Authority and Winnebago Tribe to serve as host agencies to train participants. The SCSEP will continue to use the program brochures in Spanish, Vietnamese and other languages in doing outreach.

4. *A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)*

In the rural areas of Nebraska, community service training opportunities are limited to local schools and government agencies. Larger towns offer broader training options which include health care and a wider range of community service organizations. Lincoln and Omaha have the widest range of community service possibilities including government offices (state, federal and local governments), hospitals (local, regional and university), to cultural centers, ethnic, minority and neighborhood organizations. The Nebraska SCSEP is in dialog with the area agencies on aging and senior centers to determine community service needs and to recruit host agencies.

A wide variety of community service organizations provide training for program participants and have the benefits of a part-time worker. Community service needs addressed through SCSEP includes educational activities, environmental quality, health care, housing, employment assistance, cultural and recreational services, as well as senior services such as nutrition sites, outreach and referral, and transportation.

5. *The State's long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the State, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))*

Program improvement over the next four years will increasingly focus on growing industries, developing a closer working relationship with human service organizations, supporting employers and equitably distributing SCSEP positions across our State. Suggestions include:

1. Through partnerships with other Workforce Innovation and Opportunity Act organizations develop on-the job training to address Nebraska growth industries. Long-term care will be a growth industry as the Baby Boom generation increasingly needs a variety of supportive services. Customer service jobs are in demand with companies such as Facebook, PayPal, and several insurance companies having a presence in the Omaha area.
2. Continue relationships between the SCSEP, the Nebraska Aging Network (Aging and Disability Resource Centers and Area Agencies on Aging) and the State Department of Health and Human Services to address the multiple support needs common among SCSEP participants.
3. Work with Medicaid to review program guidelines which count SCSEP training income when determining program eligibility. Current rules require interested older persons to choose between training and Medicaid. This is a long-term goal as it involves regulations change. However, Medicaid Expansion will be implemented in October 2020 which may allow some SCSEP participants between the ages of 55 and 64 to qualify for Medicaid as the poverty threshold under Medicaid Expansion is higher at 138% of the poverty level or $16,000 for a single individual.
4. Review the distribution of positions to align with the eligible population of persons over 55 years of age, commuting patterns, industry concentrations and education systems (community colleges) in the newly designated economic regions in the state. Distribution within rural areas will be monitored to assure equitable distribution of SCSEP positions. Shifting positions will be accomplished gradually as participants leave this program.

Work with SCSEP providers to assure timely reporting of participant activity into the Grant Performance Management System (GPMS), the new US Department of Labor web-based reporting and case management system).

6. *The State's strategy for continuous improvement in the level of performance for SCSEP participants' entry into unsubsidized employment, and to achieve, at a minimum, the levels specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))*

Communication is vital for the Nebraska SCSEP. Program adjustments (due to revised regulations, processes, program performance measures or employment niches for older workers) may be required for substantial changes in program operations. These developments are discussed with the Nebraska project sponsors during regular contacts or as needs arise.

Under the SCSEP, the project sponsors receive grants to create and pay for part-time (usually 18 – 22 hours a week) community service positions for low-income persons age 55 and over at local public or private nonprofit organizations. The program has a dual purpose to provide useful community service assignments for the enrollees while promoting transition to unsubsidized employment. Local public and private nonprofit organizations which provide training opportunities also benefit through the work completed by SCSEP enrollees.

<u>Strategies for Improvement:</u>

Continue to improve the Assessments and Individualized Employment Plans (IEP) to help identify participants' strengths and job training needs to enhance their skills to find unsubsidized employment.

1. Pursue On-the-job Experience (OJEs) through targeted job development and employer outreach.
2. Explore new certification program for customer service positions as Nebraska has a large number of employers with customer service/call center jobs. Work on a public-private partnership to develop a training program for this occupation by designing a curriculum that meets the employers' needs.

3. Enhance job search opportunities the sub-grantee can provide at one-stop centers through "Impact Thursdays" as well as to discuss overcoming personal issues such as self-confidence and dealing with family concerns/interruptions.
4. Pursue joint employer outreach with WIOA partners at monthly partner forums held in Lincoln and Omaha.
5. Strengthen assessments of participant skills, knowledge, interests and aptitudes and define career objectives that are relevant for the participant's interests and abilities and local business needs.
6. Research labor market information and consult with Boards, economic development agencies, chambers of commerce, and local business partners to identify targeted industries and high growth occupations appropriate for seniors.
7. Utilize the new Grant Project Management System to track placements and make case notes to follow up with employers at regular intervals.
8. Monitor sub-grantee performance in the area of placement in unsubsidized employment through quarterly conference calls, on-site visits and provide technical assistance.
9. Identify employers that have successfully hired participants, are seeking older workers based on input from Boards and business organizations and are identified in labor market studies a major employers in industries where SCSEP participants seek employment.
10. Publicize the success stories of former participants during the National Employ Older Worker Week.
11. Remind participants and host agencies during orientations and throughout the training that SCSP is a temporary training program and not an employment program.
12. Coordinate with other programs such as the Work Opportunity Tax Credit and Incumbent Worker Training Program to help participant employment rate highlighting benefits of the hires for the employer. Participants are provided general and specific training to enhance their marketability to potential employers. The training and resources provided include but are not limited to the following:
    a. Basic education skills (GED preparation and language skills classes).
    b. Basic or advanced computer skills including web-based skills and Microsoft Office Suite (some participants receive a loaner laptop).
    c. Job readiness training through job search workshops, job clubs and "Impact Thursdays" where job coaches discuss job search skills on a one-on-one basis with the participants.
    d. Education classes in specialized fields the participant may be interested in such as accounting, marketing, etc.).
    e. Soft skills training and self-improvement skills.
    f. Resources such as labor market information and approved training providers.

Host agencies provide meaning, fertile training ground for participants who don't wish to make a career change but refresh their skills to build on previous work experience. The most common occupations where host agencies help develop participant skills are administrative services, healthcare, retail and food service. Several host agencies in Nebraska end up hiring the participant which makes the match between the participant and the host agency important in facilitating permanent employment. The SCSEP will utilize new avenues of reaching employers for job development and provide participants new tools to find employment. Collaborating with the Work Opportunity Tax Credit (WOTC) Program and the Federal Bonding Program going forward will be especially useful in helping participants who have a record of a felony prior to enrolling in SCSEP. The SCSEP will look into "pre-certifying" participants for WOTC in an effort to make them marketable to employers. The SCSEP will participate in virtual and in-person career fairs at the American Job Centers. In PY 2018 Nebraska missed the Common Measures Employment Rate for 2nd quarter after exit but exceeded the Employment Rate for 4th quarter after exit. However, at the end of PY 2019 3rd quarter Nebraska has exceeded the Employment Rate for 2nd quarter after exit (YTD 55.6 with Goal being 30.5).

c. Location and Population Served, including Equitable Distribution

1. A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

<u>Nebraska Demographics</u>

According to the Nebraska Department of Labor, two-thirds of Nebraska counties are not included in a Metropolitan Statistical Area (MSA) or a Micropolitan Statistical Area (MC). According to the Census of Agriculture, Economic Research Service, in 2017, there were 46,332 farms covering 92.2% of Nebraska. Yet, according to the Bureau of Economic Analysis, only 4.1% of Nebraskans were employed in the Agriculture industry in 2018. This is a reduction from 2016.

Twenty-eight of the 93 Nebraska counties are either part of the Omaha, Lincoln, or Grand Island MSA, or are part of a MC. The greatest percentage of employing industries in Nebraska are Health Care and Social Assistance (14.8%), Retail Trade (11%), Manufacturing (10.2%), Educational Services (9.1%), Accommodation and Food Services (8%), and Finance and Insurance (5.7%). The top industries with the highest number of job openings are very similar, with Health Care and Social Assistance followed by Administrative and support services, Manufacturing, Retail Trade and Finance and Insurance. (Sources: Nebraska Department of Labor, Labor Market Information, Quarterly Census of Employment and Wages. United States Department of Agriculture, Economic Research Service, State Fact Sheets: Nebraska. Job Source: Nebraska Department of Labor Online advertised jobs data)

According to the US Census, the Nebraska population of those 55 years of age or above represents 516,506 individuals or 27.4% of the state population; an increase of 10% from two years ago. According to the US Census, Nebraskans age 65 or above represent 278,598 individuals or 14.7% of the total state population. The first of the baby boom generation reached 65 years of age in 2011. The population over 65 will increase dramatically over the next decade as baby boomers continue to age. (Source: United State Census Bureau, 2013-2017 American Community Survey 5-year Estimates).

Special Populations

The Older Americans Act requires this program provide priority in enrollment for eligible individuals who are Veterans or spouses of Veterans, those with greatest economic need, individuals who are minorities, and individuals with greatest social need, individuals who failed to find employment using available WIOA services, individuals who are homeless or at-risk of homelessness and those living in rural areas.

2. *List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.*

Table 61. Nebraska PY 2019 Authorized Positions

Type of Position	Number
Federal	203
State	63
TOTAL	266

County – Slots

- Douglas – 48
- Hall – 1
- Holt – 1
- Lancaster – 5
- Nemaha – 1
- Sarpy – 4
- Scottsbluff – 1
- Sherman – 1
- Thayer – 1

3. *Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.*

State: Nebraska

Program Year: 2018 Quarter: 3 *(Specify the quarter of the Equitable Distribution (ED) data used)*

A. *Summary of Variance*

Ensure the numbers in this section of the Equitable Distribution Report are consistent with the numbers/percentages/variance reported in the Modified Positions by State tables downloadable from the ETA System.

Table 62. Average Percentage of Variance

Service status	Number of Counties	Percent of All Counties	Average Percentage of Variance
Under-service	4	44.4%	45.5%
Over-service	6	66.7%	200%
Combined Total Under- and Over-service	10	111.1%	69.2%

B. Discussion: reasons for and significance of the variance

Please describe any significant variance and explain the possible reasons for the variance. Detail any collaboration among the state grantee and the national grantees within the state when addressing the variances by county statewide for all grantees. Describe challenges that affect your collective ability to meet and/or maintain ED in each county throughout the State. Identify if there is a history of noncompliance with ED in any area. Describe any administrative issues, grantee/sub-grantee structure, or external factors unrelated to ED patterns (e.g., a change of sub-grantee, natural disaster, etc.) contributing to the problem.

Two of the four under-enrolled counties only have an ED of one, and in four of the six counties that are over-enrolled, there is only one ED as well. With such small slot counts, the variance seems more significant on paper than it is in practice. Regarding the county with the highest over-enrollment variance, it is due to anticipating general program attrition and durational limit exits. The state and National grantee is the same agency, National Able Network, who strives to balance and address each program's needs. Some of the counties where there is under-enrollment are extremely rural, which impacts the ability to enroll there easily. After the grantee transition, National Able has been working on addressing ED compliance and has been able to enroll in counties that were received empty. Douglas County, where there is significant under-enrollment, was impacted greatly by flooding.

C. Plan to improve ED in your grant during program year

Please explain your plans to reduce the variance in your state during the program year. Describe how all SCSEP grantees will collectively work to reduce variances throughout the State. Highlight collaboration between the state grantee and the national grantees operating in the State. Provide concrete steps (consolidating positions by county, position swaps, attrition) to fix ED, particularly in difficult to serve areas such as rural counties, counties where there has been a significant historical inequity, and/or areas where there have been recent large increases in numbers of eligible persons.

The National Able Network's plan is to allow natural attrition in those areas where there is over-enrollment and continue to recruit and enroll in the under-enrolled areas. National Able is exploring new strategies to recruit participants in those hard-to-serve counties which are under-enrolled, such as print and social media ads, etc. Because National Able is both the state and national grantee, there are no plans to swap positions.

Grantee: Nebraska

A. Summary of Variance

Ensure the numbers in this section of the Equitable Distribution Report are consistent with the numbers/percentages/variance reported in the relevant modified position tables downloadable through the ETA System.

Table 63. Average percentage of variance

Service status	Number of Counties	Percent of All Counties	Average Percentage of Variance
Under-service	4	44%	45.5%
Over-service	6	66.7%	200%
Combined Total Under- and Over-service	10	111.1%	69.2%

B. Discussion: reasons for and significance of the variance

Please describe any significant variance and explain the possible reasons for the variance. Detail any challenges that affect your ability to meet and/or maintain equitable distribution. Identify if there is a history of noncompliance with equitable distribution in any area. Describe any administrative issues, sub-grantee structure, or external factors

unrelated to the equitable distribution patterns (e.g., a change of sub-grantee, natural disaster, etc.) contributing to the problem.

Two of the four under-enrolled counties only have an equitable distribution of one and in four of the six counties that are over-enrolled, there is only an equitable distribution of one. Nebraska has small slot counts which makes the variance seem more significant on paper than it is in practice. The variance in the county with the highest over-enrollment is due to anticipating general program attrition and durational limits. The state and National grantee is the same agency. Some of the counties with under-enrollment are extremely rural, which impacts the ability to enroll there easily. After the grantee transition, the state has been addressing ED compliance with National Able during quarterly conference call. As a result, National Able has been able to enroll in counties that were received empty. Douglas County, where there is significant under-enrollment, was impacted greatly by flooding.

C. Plan to improve statewide ED during program year

Please explain your plans to reduce the variance in your grant during the program year. Please provide concrete steps (consolidating positions by county, position swaps, attrition) to fix ED, particularly in difficult to serve areas such as rural counties, counties where there has been a significant historical inequity, and/or areas where there have been recent large increases in numbers of eligible person.

Nebraska plans to allow natural attrition in those areas where there is over-enrollment and continue to recruit and enroll in the areas with under enrollment. The state grantee and National Able are exploring new strategies to recruit participants in those hard-to-serve counties which are under-enrolled, such as print, television and social media ads, etc. Ads are scheduled to print and air throughout the program year. Because National Able is both the state and national grantee, there are no plans to swap positions.

4. The State's long-term strategy for achieving an equitable distribution of SCSEP positions within the State that:

A. Moves positions from over-served to underserved locations within the State in compliance with 20 CFR 641.365.

The Nebraska Equitable Distribution (ED) Report provides a basis for determining a fair allocation of program positions with the State. This report is useful for determining where to locate new positions, fill vacant positions, or reduce positions, as necessary. The most recent Nebraska Equitable Distribution Report prepared in May 2019 is provided above and is based on the latest Census data for distribution of the SCSEP-eligible population within each state. The PY 2019 modified positions are 52.

B. Equitably serves rural and urban areas.

The distribution of the Nebraska SCSEP positions has supported the rural counties. Until the last few years Douglas County, which includes Omaha, had substantially fewer positions than were equitable. During this period, the grantee shifted a number of positions into Douglas County. Future equitable distribution discussions will focus upon the adequacy of position distribution within the urban and rural counties.

C. Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

Recruitment

Enrollment priority will be given to Veterans and qualified spouses, eligible individuals having the greatest economic need and eligible individuals over 65 years of age. The Nebraska grantee has a history of focusing efforts on older individuals both with incomes below the poverty level and those with greatest social need. At the end of first quarter PY 2019, the State SCSEP program provided 56% of its positions to minority individuals. Over 85% of the Nebraska's grantee enrollees have annual incomes below the poverty level. Twenty one percent of these enrollees are Veterans. Among program participants, 62% are receiving public assistance and 87% are at risk of homelessness. Women over the age of 55 represent 52% of the total program enrollment.

Increasing Placements to Employment

Increasing the placement of trainees requires that a variety of support services be focused upon all SCSEP trainees as they approach job-ready status. This may be in the form of participation in job-clubs or specialized training through Workforce Development Board partners. Other approaches include trial employment or on-the-job training (OJE) with potential employers. Trial employment or on-the-job training opportunities will be for a limited time with the

expectation of a high rate of hiring by participating employers. This strategy will support resume development, interview skills and applying on-line for area jobs. The subgrantee will continue to monitor participants' job search by having them send job search logs and enter job searches into the pay com system. Job coaches will continue to meet with participants at "Impact Thursdays." Nebraska will utilize new strategies to reach employers and conduct job development such as distributing employer brochures, airing television and radio ads and using print media.

High growth industries in Nebraska include customer service representatives (for organizations such as PayPal, Facebook, Mutual of Omaha and Blue Cross/Blue Shield) and entry-level health care positions. These opportunities provide a livable wage for Nebraskans and a chance for advancement in growing organizations. Office support is another opportunity which matches the interest of many persons over the age of 55. However, all of these opportunities require a working knowledge of computers. The Nebraska SCSEP will pursue setting up a customer service training program for participants and provide job search tools to find unsubsidized employment.

Continued success in meeting performance goals will require maintenance and further development of partnerships within the Workforce Development Board and business community.

Program participants who locate employment will continue to receive program support. This support will consist of regular follow-ups at second quarter after participants exit from the program and after the fourth quarter after exit and with their employers. The purpose of follow-ups is to address any issues and support these workers in their new jobs.

5. *The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))*

The Nebraska eligible population over 65 years of age based on poverty level in the state is 20,554. The ratio of eligible individuals in each service area to the total eligible population in the state is provided in the table below.

Table 64 (S1701). Ratio of eligible individuals in each service area to the total eligible population in the state

Nebraska Service Areas	Eligible Population	Ratio of Eligible to Eligible Population in the State
Central	1,722	.084
Grand Island MSA	1,133	.055
Lincoln MSA	2,251	.109
Mid Plains	1,671	.081
Northeast	3,432	.167
Omaha Consortium	6,669	.324
Panhandle	1,435	.067
Sandhills	591	.029
Southeast	1,650	.080

Source: United State Census Bureau, –2013 – 2017 American Community Survey 5-year Estimates

6. *The relative distribution of eligible individuals who:*

   A. *Reside in urban and rural areas within the State*

According to population estimates from the 2013-2017 Census, much of the State population growth has been in urban counties. More remote counties have lost population. Sarpy County, part of the Omaha MSA, has grown rapidly in the last few years. The 2010 Census notes that 35% of the Nebraska population over 60 years of age lives in rural areas. While bio-technology, internet commerce and transportation services are growing rapidly in the eastern cities, most of Nebraska is rural with an economy that is heavily farming and ranch dominated.

   B. *Have the greatest economic need*

The term greatest economic need is defined as persons at or below the poverty level established by the US Department of Health & Human Services. The Nebraska population age 60 and over includes 27,949 individuals with incomes below the poverty level, and 11,805 individuals over are 75 with incomes below the poverty level (Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates).

   C. *Are minorities*

According to the U.S. Census, 2013-2017 American Community Survey 5-year estimates, there were about 15,151 Native Americans living in Nebraska. Population totals for other races, according to the U.S. Census were: White: 1.6 million, Black: 89,014, Asian: 41,666, Native Hawaiian: 1,894, and Two or more Races: 45,254. There were 198,861

Hispanics or Latinos living in Nebraska. Foreign born naturalized citizens represent 50% of Whites living in Nebraska. This compares with 10% of Blacks, 27.2% of Asians, and 41% of Hispanics. Hispanics were the largest category of foreign born population, at 53,570, and had the lowest rate of becoming naturalized US citizens.

For the Nebraska SCSEP, the term "minorities" includes American Indians or Alaskan Natives, Asians, Blacks or African-Americans, Hispanics or Latino Americans and Asians or Pacific Islanders. The majority of Nebraska's African-American population lives in Omaha and Lincoln. The distribution of Nebraska's Hispanic population is broader with a presence in many of the smaller cities such as Norfolk, Lexington and Scottsbluff.

(Source: US Census Bureau)

D. Are Limited English Proficient

Nebraska uses the following strategies to recruit eligible individuals into the SCSEP program with factors such as greatest economic need, social need and/or limited English proficient. Nebraska utilizes the area agencies on aging and Aging and Disability Resource Centers, senior centers, one-stop centers, WIOA partners such as Vocational Rehabilitation and the Commission for the Blind and Visually Impaired, the Latino Commission, Asian Center and the Intercultural Senior Center to recruit those with greatest economic and social needs and limited English Proficient.

The total number of participants assisted during PY 2018 were 90. The table below shows the percentage of eligible individuals that were assisted by the SCSEP program in PY 2018 that meet the criteria of greatest economic or social need or are limited English proficient.

Table 65. Eligible individuals assisted by SCSEP in PY 2018 meeting greatest economic, social need, LEP criteria

Most in Need Measure	Percentage of SCSEP Participants
Individuals with disabilities	23%
Individuals with limited English Proficiency	7%
Individuals with low literacy kills	4%
Individuals residing in rural areas	18%
Individuals with low employment prospects	96%
Individuals who fail to find employment after WIOA Title I	24%
Individuals age 75 and over at date of report	8%
Individuals who are homeless or at risk of homelessness	79%
Displaced homemakers	3%
Veterans (or eligible spouses)	21%
Post 9/11 era veterans	1%
Individuals receiving public assistance	58%
Individuals with severe disability	0%
Individuals who are frail	0%
Individuals old enough for but not receiving SS Title II	0%
Individuals with severely limited employment prospects in areas of persistent unemployment	0%

Source: SCSEP Performance and Results Quarterly (SPARQ) system for PY 2018

As shown in the table above 7% of SCSEP participants fell in the Limited English Proficiency measure in PY 2018. Five percent of Nebraska's total population has limited English proficiency and .90% Native born individuals have limited English proficiency (source: 2013-2017 American Community Survey 5-year estimate).

The characteristics of the limited-English-proficient population in Nebraska is also discussed in the common section of the Nebraska Combined State Plan. Nebraska has established a Limited English Proficiency (LEP) Plan, which ensures that individuals with limited English proficiency are able to access programs and services provided through the one-stop delivery system on an equitable basis. The LEP Plan is posted on the Nebraska Department of Labor "Manuals, Plans, and Reports" web page which is accessible at www.dol.nebraska.gov.

E. Have the greatest social need. (20 CFR 641.325(b))

The characteristics of the limited-English-proficient population in Nebraska is discussed in the common section of the Nebraska Combined State Plan. Nebraska has established a Limited English Proficiency (LEP) Plan, which ensures that individuals with limited English proficiency are able to access programs and services provided through the one-

stop delivery system on an equitable basis. The LEP Plan is posted on the Nebraska Department of Labor "Manuals, Plans, and Reports" web page www.dol.nebraska.gov.

7. *A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))*

Communication is vital for the Nebraska SCSEP. Program adjustments may be necessary for a variety of reasons. Reasons vary from the population shift documented by a new Census to an adjustment in funds available to support this program. Modest program adjustments (such as yearly Equitable Distribution position level changes) will not have an impact on current individual enrollees. Actual program shifts would occur as participants leave the program for unsubsidized jobs or for other reasons. A decrease in program funding will also require similar action. A substantial cut in funding will require a more significant program adjustment such as a reduction in the weekly participant's training hours. All participants will continue to receive program support during a program adjustment period. Disruption is avoided during natural disasters by contacting all participants, host agencies and sub-grantee staff for accounting them and getting updates on their status as was done in 2019. Similarly, pandemic situations will be managed by revising or developing new policies such as the sick leave policy to ensure participants receive the benefits on an ongoing basis and develop a plan to ease the transition back to work for participants as well as host agencies. Participants will receive services virtually in the event of a lockdown due to a pandemic and they will be asked to continue their job search during this time. These developments are discussed with the SCSEP subgrantee during regular contacts or as needs arise. If there is a change in the subgrantee, Nebraska state grantee will schedule a meeting with the outgoing and incoming subgrantees to develop a transition plan to inform participants and host agencies, transferring records, holding orientations for participants and host agencies and discuss continuity in administrative and programmatic functions.

END OF PLAN