

MINNESOTA PYS 2024-2027

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OVERVIEW

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

OPTIONS FOR SUBMITTING A STATE PLAN

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

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), 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

[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 also address the needs of target populations. Use of links to external websites and documents is permitted within the State Plan narrative submission, if such links remain active and adhere to Section 508 accessibility requirements.

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

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

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

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

This is a combined plan

COMBINED PLAN PARTNER PROGRAM(S)

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

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

Yes

Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

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)))

Yes

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

Yes

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

Yes

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

No

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

Yes

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

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

The State Strategic Vision, Goals and Strategies for 2024-2027 were developed by modifying the previous State Plan's Vision, Goals and Strategies in consultation with workforce program administrators, the Governor's Workforce Development Board (GWDB), the Minnesota Association of Workforce Boards (MAWB), and the National Governor's Association (NGA). The shift in Vision, Goals and Strategies represents a new strategic direction for workforce development in the state, one that is focused on breaking down silos across workforce partners and being more intentional and proactive about the delivery of programs and services to Minnesotans.

The following content was removed as is no longer requested under federal guidance. All modifications to Minnesota's State Plan reflect changes as required by federal statute and guidance.

Leveraging historic infrastructure investments

~~The GWDB supports five state-wide sector partnerships focused on the five most in-demand sectors in Minnesota which are highly aligned to the historic federal infrastructure investments: the trades, technology, manufacturing, education and the caring professions. The GWDB will be leading efforts to bring sector partners together to support equitable and inclusive recruitment and retention efforts for building the needed workforce, especially those focused on creating more diverse and representative workforces in the construction sector. Building a more diverse workforce is a major focus of Governor Tim Walz and Lt. Governor Peggy Flanagan's administration, and the work of the state-wide sector strategies will focus on providing support and resources to expand successful recruitment and retention initiatives and partnerships focused on diversity, equity, inclusion and accessibility. This includes breaking down silos between different programs or agencies to create a statewide strategy with regional and local areas of focus to meet the upcoming workforce needs.~~

~~As an example of breaking down silos to improve service delivery, the GWDB in partnership with the Governor's Office, Minnesota Management and Budget (MMB), and the Economic Analysis and Labor Market Information divisions within DEED and are working together to conduct a cross-agency and cross-industry analysis of upcoming occupational needs related to the Infrastructure Investment and Jobs Act, known as the Bipartisan Infrastructure Law (BIL). As part of this occupational analysis, the team will also be diving deeper into the demographic analysis of occupations and sectors most in demand and will be bringing together partners to help close existing equity gaps.~~

~~Once this analysis is complete, the GWDB will be leading both the development of a state-wide human capital plan and providing information to local workforce partners across the state so that this information can be used to inform the upcoming WIOA Regional and Local planning efforts for 2024-2027. This will ensure a coordinated state and local approach to addressing the cross-sector workforce needs our state will face over the coming years. The GWDB has also been playing a leading role in supporting the development of workforce plans for a number of additional historic infrastructure investments, including the Broadband Equity Access and Deployment Plan, the Minneapolis-St. Paul region's recent Tech Hubs designation, and the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act.~~

~~Minnesota is committed to implementing the US Department of Labor and Department of Commerce's Good Jobs Principles through our sector strategies, understanding implementation of this vary slightly as the demographics and challenges for the sectors vary. This includes identifying demographic gaps to help determine recruitment and hiring practices, amplifying worker voice, providing job security and safe working conditions, identifying best practices to~~

improve organizational culture, and career pathway development and sharing. The approach for achieving this differs slightly by industry as there are varied areas of more pressing focus, but this strategy will be embedded across all of our work.

With respect to the BIL, in many cases the benefits provided to workers in the related sectors and occupations are often a barrier for entry, so identifying common benefits that help to bring down barriers to employment for the underrepresented will be prioritized. Benefits like flexible and advanced scheduling, child care support, access to health care, paid time off and future compliance with Minnesota's new paid family leave program, transportation, and retirement benefits will all be part of this conversation. Additionally, through the sector strategies we will identify common best practices to support pay transparency to ensure that wages paid to workers in these in-demand occupations do not differ due to gender or race.

An example of this is committing to using registered apprenticeship programs (RAPs) to support a well-trained workforce. Minnesota has a longstanding, demonstrated commitment to developing, expanding, and sustaining high-quality statewide RAPs and to increasing RAP participation and completion by underrepresented populations. Minnesota is host to a number of initiatives and providers that support women and other under-represented populations gaining skill, experience and working in construction industries. RAPs are already active and growing in the number of the occupations identified by NTIA, including Laborers, equipment operators, and telecommunication technicians.

As part of the Minnesota CHIPS Coalition, the GWDB is serving as the lead or "backbone organization" role for the Minnesota CHIPS Coalition Workforce Partnership (CHIPS Workforce Partnership). The GWDB has a Federal and State statutory responsibility to align the state's workforce vision and strategy across state agencies and with a variety of stakeholders which uniquely positions the CHIPS Workforce Partnership to be able to engage partners from across the state and better leverage the historic investments the state is making in workforce development.

CHIPS Workforce Partnership has established a sectoral and cross-sector partnership engaging key employers, unions, education institutions, and community-based partners to train workers in the skills needed for high-demand jobs. This partnership is addressing the challenges that hinder workers' participation, recruitment, placement, and retention in the in-demand jobs providing family-sustaining wages that employers as part of this partnership are offering and thereby unlock opportunities in science and technology for those who have been historically left out.

CHIPS for America funding provides the opportunity to strengthen the semiconductor industry and enhance economic competitiveness for our region while contributing to the work of closing historical wealth and wage gaps. COVID-19 illuminated inequities in our local communities. The pandemic exacerbated long-standing inequities in employment and financial well-being and persistent racial trauma. CHIPS for America represents an unparalleled opportunity to address these challenges while bridging the gulf between employers' needs and workers' realities, build pathways for workers into family-supporting careers, and dismantle the underlying structural and systemic roadblocks that exclude underrepresented workers from the region's overall prosperity. A collaborative, equity-focused response targeting historically under-served populations is needed as our region emerges from the continued social and economic aftermath of the murder of George Floyd.

Our workforce plan was developed in partnership alongside other Minnesota-based semiconductor and related microelectronics industry employers because we recognize that

collaboration is critical to overcoming the barriers to growing the industry and achieving our ambitions. The details of the plan described in this section highlight the State's developing strategy for supporting workforce planning for federal funding and for the sector partnership strategy described below to (1) recruit and train the workforce needed to meet employer needs throughout the state and (2) establish a firm foundation to build the workforce pipeline that will sustain growth. Key takeaways of our plan:

1. **Employer-led:** this plan reflects the aggregated hiring demands of employers in Minnesota. This includes aggregating hiring demand, finding commonalities in our occupation and skills needs to reflect our workforce needs more accurately and efficiently to partners. Because of this collaboration we have a clear view of the critical roles and number of positions that must be filled over the coming years if we are to expand and modernize.
2. **Collaborative:** this plan recognizes that we have a long history of collaborating in Minnesota, which includes relationships between workforce boards, education and training providers, including high schools and postsecondary education institutions, unions, and community-based organizations.
3. **State of Minnesota Leadership:** Minnesota is responding to our workforce challenges by expanding interagency collaboration and leveraging historic state and federal investments to meet the moment.
4. **Equity and Community:** We recognize that we can meet the needs of employers by doing more to reach underrepresented and economically disadvantaged populations.

The strategies described with regard to the BIL and CHIPS and Science Act will also be leveraged as part of Inflation Reduction Act (IRA) investments in Minnesota. The GWDB and DEED's Labor Market Information (LMI) office are working together to support the initial occupational needs assessment based on upcoming identified projects for the Climate Pollution Reduction Grants (CPRG) Program.

Investments that prepare workers for quality jobs:

This year Minnesota's legislature passed historic investments in legislative priorities and key items to improve the workforce development system across the state, including passing a \$72 billion biennial budget. Major investments in groundbreaking programs like Paid Family and Medical Leave, Free Community College, and Child Care all will make a major difference in the lives of working families across the state.

For the Department of Employment and Economic Development (DEED), Minnesota's federally recognized workforce development agency, these investments include:

- \$50 million in funding for Targeted Populations to support employment services and training to bring workers who have been overlooked for employment — particularly people of color — into the workforce at family-sustaining wages.
- \$20 million in Drive for 5 funding to prepare the workforce to enter five of the most critical occupational categories in the state with high-growth jobs and family-sustaining wages
- \$400 million for the Minnesota Forward Fund, \$250 million of which is being made available to match federal funds made available in the Chips and Science Act which can also be matched by employers to support workforce development activities.

- \$15 million for Child Care Economic Development Grants and \$1 million to create a new Office of Child Care and Community Partnerships.
- An additional \$20 million for youth workforce development programs.
- \$4 million to create an Employer Reasonable Accommodations Fund which will reimburse small to mid-sized Minnesota employers for expenses tied to providing reasonable accommodations for employees with disabilities and \$3.89 million increase for the Individual Placement and Supports (IPS) Program to provide specialized supports to people with serious mental illnesses so they can find and maintain steady employment.
- In addition, there are critical ongoing resources that focus on target industries and prepare Minnesotans for quality jobs year after year—often in combination with the resources listed above—such as WIOA Adult/Dislocated Worker/Youth and Pathways to Prosperity workforce programming administered through DEED.

The Minnesota Department of Labor and Industry (DLI), which serves as the State Apprenticeship Agency, oversees employment-based training programs. In addition to registered apprenticeship, DLI administers the Minnesota Dual Training Pipeline, which supports employers in developing their own dual training programs and Youth Skills Training, which supports the development of partnerships that provide safe, meaningful work experiences for student learners. All of these programs provide pathways into in-demand occupations and received historic funding, including:

- \$1 million for Labor Education Advancement Program (LEAP) grants to better facilitate the participation and retention of women, people of color and Indigenous people in registered apprenticeship programs (RAPs)
- \$3 million for clean economy apprenticeship grants
- \$9.02 million in FY24 to the Minnesota Office of Higher Education (OHE) to fund the dual training grant, which supports employers in developing and expanding their dual training programs; \$1.5 million in Youth Skills Training (YST) grants to encourage, promote, and support the development of local partnerships between schools, employers and community organizations to provide 16- and 17-year old student learners with safe, healthy, meaningful work experience in high-wage, high-demand industries.

Minnesota views good jobs as an essential element of creating an economy that works for all. This past year, Minnesota was selected to participate in USDOL's Job Quality Academy (JQA), with DEED as the lead partner, with the goal of better integrating job quality principles into all workforce development work across the state. The Minnesota Job Quality Academy Team has representatives across all workforce development stakeholders, creating a powerful synergy between efforts and ensuring in-demand employment opportunities are informed by the Department of Commerce and Department of Labor's Good Job Principles: recruitment and hiring, benefits, diversity, equity, inclusion, and accessibility (DEIA), empowerment and representation, job security and working conditions, organizational culture, pay, and skills and career advancement.

As part of that work, the Minnesota JQA team defined quality jobs in Minnesota as: The job seeker and employer match of equitable, competitive pay with regular opportunities for advancement, access to family-supporting benefits, holistic empowerment and representation,

positive organizational culture, while communities benefit from greater stability for families as well in the local economy. With its roots in DEED's mission to empower the growth of the Minnesota economy for everyone, the definition of job quality stems from "an economic environment to produce jobs and improve the quality of the state's workforce." Minnesota recognizes that a quality job means different things to different people:

- Our New Americans may define it as a well-paying job which help establish their new lives in Minnesota and where transportation, English language learning support, and religious and cultural acceptance is the norm.
- Parents may define it as workplace flexibility to attend to their children's childcare, school, and health needs while providing family-sustaining benefits.
- Minnesota's Black, Indigenous, and workers of color who have experienced the deepest disparities in our country and state, as well as bias in the workplace, may define it as a job that provides them 100% of the wages of their white counterparts, equal access to job prospects without discrimination, and a culture of inclusivity.
- Employers will define it as a job that allows their employees to live without stress, empowering them to come to work each day knowing that they are respectfully compensated for their time. Their employees are paid wages which fully support them without relying on public assistance funding.
- Employers can use their quality jobs to see improvements in recruitment and retention, lower turnover and increased positive organizational culture. These benefits will ideally net gains for the employers, such as greater productivity, increased profits, business expansion, and more.

In addition to the specific needs and interests of Minnesota's diverse population, good jobs for all support strong career pathways, positive work culture, skill and knowledge growth and wages and benefits that contribute to quality of life for Minnesota families.

Data-driven decisions

Minnesota's workforce strategies are based in data and ensure that data helps lead our strategic workforce efforts and investments. An example of this is the Drive for 5 Initiative, which is based on data demonstrating the sectors in Minnesota with the highest growth of family sustaining wages. Drive for 5 focuses on moving Minnesotans into high-growth employment opportunities with family sustainable wages and prioritizes training for populations that face some of the most significant barriers to employment: people of color, people with disabilities, and those that face other systemic barriers.

This initiative will prepare a workforce to enter five of the most critical occupational categories in the state with high-growth jobs and family-sustaining wages: Technology, Caring Professions, Education, Manufacturing, and Trades and create a pipeline of workers who are skilled and prepared to enter high-growth and high-wage employment. This work is being grounded at the GWDB, with employer-led sector partnerships already established for each of the sectors listed above. Each of the sector partnerships under the GWDB are focused on four key outputs: addressing top talent needs, identifying supporting programs, career pathway development, and defining targeted populations and barriers to employment. The GWDB and DEED's LMI office collaborated to create an article describing the effort and industry profiles for each of these occupations, ensuring that any additional decisions or programming would be data-driven decisions.

The focus on data continues to our regional and local planning process. Minnesota does best when state agencies and community partners collaborate to achieve common goals. Through the state, local and regional planning process, the GWDB seeks to build in alignment of the state agency, local, and regional programs and priorities. This involves transparency in the state's planning, programs, initiatives and funding prior to the start of the local and regional planning process.

In the planning process each local area provides an opportunity to share with the state their regional perspective on ways to incorporate the state's vision, goals, and strategies for interagency coordination at the local level. Local/regional planning will now be overseen by the Governor's Workforce Development Board (GWDB) staff, with the goal of increasing alignment and strategic coordination with the State Plan.

Through this planning process our local partners are being asked to incorporate strategic alignment between local, state, and federal programs, planning, and resources. It is critical that local areas and regions look to their economic and labor market information (LMI) and adjust strategies for what may now be a different set of circumstances post pandemic, with growing and declining industries, occupations and skills, and changing demographics. Regionally there will be a need to adapt workforce goals and strategic focus for those communities with disproportionately higher unemployment rates and lower earning particularly among underserved population groups, or individuals facing barriers to employment (e.g., low income individuals, English language learners, individuals without housing, and individuals with disabilities). Regional plan narratives must incorporate updates in data analysis. communities to flourish there must be equitable access for all Minnesotans to workforce development programming, employment, and a family sustaining wage. DEED's Labor Market Analysts have provided data specific to regions and local areas. Regions have challenges, successes, trends, and promising practices that are unique to their respective locations.

Finally, data on occupational and demographic data will be crucial to informing all federal funding opportunities through BIL, CHIPS and IRA. For example, with regard to the construction sector, occupational profiles have shown that there are nearly 140,000 jobs at about 18,000 employer establishments, making construction the 8th largest employing industry in Minnesota, with the 4th largest number of establishments. Average annual wages are just under \$80,000, about \$10,000 above the total of all industries. In general, the more defined and technical the skills, the higher the wage in these occupations, though rising demand has also helped push wages higher. The recent rise in construction employment has led to an increased number of job vacancies across the state. The median wage offered for these vacancies increased to \$23.50 per hour in the second quarter of 2022, up nearly \$2 per hour compared to the same survey in the second quarter of 2019, and up nearly \$3.50 from the second quarter of 2021 when vacancies peaked.

Demographic analysis of occupations and sectors most in-demand are crucial for bringing together partners to help close existing equity gaps. To continue with the construction example, not surprisingly, the Construction industry relies more heavily on younger workers, with nearly 80% (79.2%) of workers between 19 and 54 years of age, compared to 72.4% across all industries. Across all industries, 94.2% of jobs are held by workers identifying as white alone, compared to 94.1% in Construction, making it one of the least racially diverse industries in the state. Additionally, Construction is a male-dominated industry, with males holding nearly 85% of total jobs, compared to a nearly 50-50 split across all industries. In the face of tight labor markets, construction workforce planning will need to continue to tap into new labor pools by

age, race, and gender in order to attract the talent they need to grow and replace existing workers in the future.

Investing in Youth

As described briefly above, Minnesota had a historic legislative session in terms of investments in Minnesotans, which includes investments in youth. The Jobs bill doubled the existing funding to put \$20 million in the FY24-25 biennium toward youth workforce development—which will serve over 38,000 young people. This expands Minnesota's results-driven Youth at Work, Minnesota Youth Program and YouthBuild programs to prepare more Minnesota young people to enter the workforce focused and work-ready.

Additionally, Minnesota is managing a \$2.5 million, 42-month Disability Employment Initiative (DEI) grant funded through the U.S. DOL's Employment and Training Administration and the Office of Disability Employment Policy. This grant allowed three of Minnesota's rural WDAs to strengthen partnerships and strategically align career pathways systems to effectively serve youth with disabilities through multiple entry and exit points. The federal DEI grant allowed Minnesota to expand the number of Employment Networks (ENs) in the state which increases services to Social Security disability beneficiaries. More information about investments in youth can be found throughout this plan, including in Section III: Operational Planning Elements section and Section VI: Program-Specific Requirements for Core Programs

Equity in service delivery and educational programming

Every year, DEED identifies agency-wide outcomes and key results (OKRs) and brings together teams to collaborate to achieve them. Setting strong goals and regularly measuring progress is a hallmark of a well-run organization. OKRs ensure that we are all moving in the same direction. Even though DEED's individual programs are different, our ultimate mission—*'to empower the growth of the Minnesota economy for everyone'*—cannot be achieved unless teams are working together.

Objective 1: Empower Minnesota to create an economy rooted in equity across every race, identity, and ability.

Key Results:

1. For direct-to-business programs, implement standardized demographic questionnaire for economic development programs and align with demographic data collection for workforce development programs.
2. For requests for proposal (RFP) partner programs, require RFP grant partners to identify the target groups they serve by assessing who their end-users are (following the Office of Business Finance demographic categories to the extent possible) in order to convey the reach and impact DEED has on equity.
3. Establish quarterly engagement plan for new Office of Public Engagement Director and Communications to meet with senior leadership about proactive outreach planning (program milestones, desired external footprint, tailored messaging, planning and execution).
4. Enhance DEED employee awareness of language access responsibilities, resources, and requirements to translate and interpret information for customers.

5. ~~Achieve and sustain a workforce that at least matches the representation of Minnesota's diverse communities, specifically regarding race and ethnicity, by July 2024.~~

~~Objective 2: Drive growth that puts Minnesota at the forefront of innovation in technology, high-tech manufacturing, and health and wellness.~~

~~Key Results:~~

1. ~~Increase the business development pipeline (creating, fostering, and retaining opportunities) in target sectors by 15%.~~
2. ~~Establish at least seven new partnerships and collaborations between businesses, higher-ed institutions and other partners focused on target sectors.~~
3. ~~Feature at least 25 businesses within target sectors in DEED events, press conferences, media opportunities, and promotional campaigns.~~
4. ~~Increase participation (attendance, sponsorship, exhibitor) by 20% in the most important and relevant outreach channels (trade shows, events and meetings).~~

~~Objective 3: Meet the moment for Minnesota's historic workforce shortages, with collaborative efforts towards high-wage jobs with strong growth potential.~~

~~Key Results:~~

1. ~~DEED workforce programs will increase by 5% the number of participants they serve who come from Quartile 1 and 2 of the Social Vulnerability Index (SVI), which includes the most vulnerable populations and areas of the state.~~
2. ~~80% of Job Creation Fund/Minnesota Innovation Fund recipients hire at least 20% of participants from programs administered by Workforce Development and Workforce Services.~~
3. ~~Improve and provide training to DEED staff, grantees, and Local Workforce Development Area partners on how to assist job seekers in learning more about and entering into Occupations in Demand and the Drive for Five sectors.~~
4. ~~Through the workforce digital transformation project, implement system integration and technology recommendations that support DEED in creating a better customer experience for individuals and employers.~~

Enhance supportive service offerings

Providing additional support for supportive services is embedded in most of the work that our workforce partners across the state undertake and is ingrained into many of the state grant programs such as Drive for 5 and Targeted Populations.

One area of supportive services that was a major focus of Minnesota over the last legislative session, however, was childcare. Minnesota rose to face its childcare challenges through seven omnibus bills, as well as the Paid Family and Medical Leave Act, which contained policy or funding to benefit families with children. A summary of these momentous investments is found here, with a few state governance focused investments below:-

- ~~A new Department of Children, Youth, and Families was created to combine related programs from several current departments under one department.~~

- Establishes the Office of Childcare Community Partnerships within the Department of Employment and Economic Development to coordinate with government and business entities to promote investment in childcare businesses and access and to administer childcare economic development grants, among other duties.
- Allocates \$50,000 per year to the Labor Market Information Office to conduct research and analysis related to the childcare industry.

Supportive services are a key aspect of the work providers do under all DEED grants. The allowable use of supportive service funds elevates best practices among providers and increases positive impacts.

Strategic partnering

Strategic partnering is a theme across all three of Minnesota's State Plan goals, and starting in 2024, the GWDB will host convenings with relevant partners and stakeholders to gain feedback and build plans and metrics for meeting each of our state's goals that include strategic partners across the workforce system in the state.

Starting in 2023 and happening annually thereafter, the GWDB hosts an annual Workforce Summit to bring together workforce development stakeholders around the State's Vision, Goals and Strategies for our workforce development system. The inaugural Workforce Summit included breakout listening sessions on the State's Vision, Goals and Strategies with state program administrators and local workforce board representatives. This provided an opportunity for both state and local partners to hear from one another, to share best practices and discover potential ways for interagency and local coordination taking into consideration where we are as a state and what we hope to accomplish in the next four years.

Through the One Minnesota Results process, they identified that a lack of a clear, state agency-wide workforce strategy hampers the ability of the state system to effectively address workforce issues and shortages, too often resulting in duplication of efforts, gaps in workforce services provided to employers and job seekers, and misaligned strategies between agencies. These findings are consistent with feedback the GWDB has received from members and workforce stakeholders across the state. In consultation with members of the Governor's Cabinet Affairs Office, the Goal Leads identified the GWDB as the structure through which stronger interagency alignment could be developed.

The GWDB will be updating the structure of the Board to include a new Commissioner Committee which will support the implementation of system improvements based on the Governor's priorities and recommendations from the GWDB. This will be the primary space for developing internal interagency alignment. The Committee will be composed of Commissioners, assistant commissioners, and deputy commissioners as determined appropriate by each agency. The Commissioner Committee will create these special committees based on identified needs and priorities. They will be led by enterprise senior leaders and comprised of subject matter experts from multiple agencies. Special Committees will vary in duration based on need and will determine plans for executing Commissioner Committee priorities. The purpose of this newly proposed set of structures is to be responsible for implementation of strategic workforce efforts.

Both the GWDB's Executive and Commissioner committees will share and respond to information and feedback from each other, the full GWDB Board, and the Governor's Office. GWDB staff will play a critical role in this process through sharing of information and commonly identified priorities, especially between the Governor's Office and the Commissioner and

~~Executive Committees. Communication between the Executive and Commissioner committees will also be supported by DEED and MDE commissioners' participation in both committees.~~

~~This work will be defined by overarching aim of using the GWDB as the space for interagency alignment. Enable thoughtful, strategic, aligned, and proactive interagency decision-making and collaboration, and hold ourselves accountable for reaching a 4.4% vacancy rate overall and in the Drive for Five sectors. This will be accomplished through focusing on three aims:~~

- ~~• Aim 1: Ensure Enterprise-wide alignment and defined agency ownership of workforce efforts across the Drive for 5 Sectors.~~
- ~~• Aim 2: Define metrics and measurable goals to track progress on stated outcomes and timelines.~~
- ~~• Aim 3: Ensure effective internal and external communication about statewide talent attraction and retention strategies.~~

~~The focus on strategic partnering also extends to the state's new sector partnership strategy which is described above and in more detail in Section (II)(c)(1) on Sector Partnerships.~~

I. 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. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes 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; farm workers (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. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

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

i. Existing Demand Industry Sectors and Occupations

Minnesota is home to a strong and diverse economy, with employment spread across several industries. While most industries lost jobs during the pandemic recession and some have still not fully recovered, many are now back to or even above their pre-pandemic employment levels, including 10 that now have more jobs than before the recession. [While the labor market is loosening as the number of workers and unemployed workers continues to go up through 2025 but the number of job vacancies is trending down, many employers still report a](#) struggle to find enough available workers to fill their openings.

[Over the course of 2025,](#) thousands of jobs are being added across the state each month, but thousands more are still open and waiting for workers to fill them. Employers have responded by raising wages, increasing hours, offering benefits, and changing experience and education requirements to attract a broader pool of applicants. [The return to pre-pandemic labor market tightness is leading to unprecedented opportunities and challenges.](#) Data from DEED's [Quarterly Census of Employment & Wages program](#) shows that the state of Minnesota had an average of nearly ~~200,000~~[213,500](#) employer establishments in 202~~5~~[2](#), providing an average of about ~~2,855,968~~[2,135,000](#) total jobs. Total wages paid were just under ~~\$200-218~~[\\$200.218](#) billion [in 2024](#), with average annual wages ~~of just \$69,713~~[above \\$73,000](#) across all industries (see Table 1).

Table 1. Minnesota Industry Employment Statistics, [Quarter 2 2025](#)

NAICS Code	NAICS Industry Title	Number of Establishments	Number of Jobs	Average Annual Wage
0	Total, All Industries	213,487	2,967,842	\$73,164
62	Health Care & Social Assistance	26,864	553,364	\$68,120
31	Manufacturing	8,542	315,339	\$81,848
44	Retail Trade	17,790	281,656	\$39,000
61	Educational Services	5,464	248,089	\$67,548
72	Accommodation & Food Services	12,877	232,469	\$27,664
54	Professional, Scientific, & Technical Services	30,265	166,537	\$117,312
23	Construction	18,611	153,305	\$87,100
92	Public Administration	3,347	148,624	\$78,416
52	Finance & Insurance	11,476	136,293	\$119,912
42	Wholesale Trade	15,879	134,116	\$103,844
56	Admin. Support & Waste Mgmt. Services	10,422	121,750	\$56,888
48	Transportation & Warehousing	6,198	114,590	\$69,420
81	Other Services	20,410	92,556	\$48,412
55	Management of Companies & Enterprises	2,627	84,349	\$129,948
71	Arts, Entertainment, & Recreation	4,023	59,339	\$50,544
51	Information	7,641	44,406	\$112,996

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53	Real Estate and Rental and Leasing	6,912	36,079	\$68,432
11	Agriculture, Forestry, Fishing and Hunting	3,303	24,307	\$50,648
22	Utilities	569	14,821	\$133,744
21	Mining	267	5,845	\$101,972

Source: DEED Quarterly Census of Employment & Wages

NAICS Code	NAICS Industry Title	Number of Employer Establishments	Number of Jobs	Total Wages	Avg. Annual Wages
0-	Total, All Industries	199,991	2,854,990	\$199,029,523,595	\$69,713
62	Health Care & Social Assistance	23,313	494,072	\$31,089,770,882	\$62,924
31	Manufacturing	8,523	323,787	\$24,914,065,671	\$76,946
44	Retail Trade	17,492	281,787	\$10,562,740,621	\$37,485
61	Educational Services	5,031	225,377	\$13,065,569,289	\$57,972
72	Accommodation & Food Services	12,471	217,223	\$5,485,130,200	\$25,251
54	Professional & Technical Services	27,489	167,149	\$19,034,502,228	\$113,877
52	Finance and Insurance	10,553	142,631	\$17,764,184,313	\$124,546
23	Construction	17,928	139,940	\$11,164,040,565	\$79,777
56	Admin. Support & Waste Mgmt. Svcs.	9,791	134,710	\$7,222,136,844	\$53,612
42	Wholesale Trade	14,888	131,542	\$13,162,654,592	\$100,064
92	Public Administration (2021 data)	3,391	130,805	\$8,630,377,719	\$65,979
48	Transportation & Warehousing	6,262	113,569	\$7,340,158,377	\$64,632
55	Management of Companies	2,053	97,228	\$12,487,183,107	\$143,156
81	Other Services	19,943	86,981	\$3,765,109,853	\$43,287
71	Arts, Entertainment, & Recreation	3,842	49,329	\$2,212,960,813	\$44,861
51	Information (2021 data)	4,892	46,152	\$4,413,389,950	\$95,627

53-	~~Real Estate & Rental & Leasing~~	~~6,908~~	~~35,337~~	~~\$2,297,616,095~~	~~\$65,020~~
11-	~~Agriculture, Forestry, Fish & Hunting~~	~~3,152~~	~~23,098~~	~~\$1,099,462,001~~	~~\$47,600~~
22-	~~Utilities~~	~~525~~	~~13,724~~	~~\$1,670,403,649~~	~~\$121,714~~
21-	~~Mining~~	~~244~~	~~5,644~~	~~\$651,648,735~~	~~\$115,459~~

Source: DEED Quarterly Census of Employment & Wages

Health Care & Social Assistance is the largest employing industry in Minnesota, providing about ~~495,553,050~~ jobs, or ~~187.63~~% of total jobs. Manufacturing is next largest, with ~~324,315,050~~ jobs, or ~~104.63~~%, followed by Retail Trade with ~~281,650,000~~ jobs (~~9.59~~%), Educational Services with ~~225,245,100~~ jobs (~~8.47.9~~%), and Accommodation & Food Services with ~~217,232,500~~ jobs (~~7.86~~%). Combined, those five industries account for over half (~~55.4~~%) of total employment in the state.

-Likewise, Health Care & Social Assistance and Manufacturing have the largest total payrolls, at ~~\$343.71~~ billion and ~~\$264.79~~ billion in 2024, respectively. But the next largest include high paying industries Professional & Technical Services at ~~\$19.20.4~~ billion, Finance & Insurance at ~~\$187.8~~ billion, and then Wholesale Trade, Educational Services, Construction, and Management of Companies, all of which are over \$12.5 billion in total payroll. Despite being third largest in employment, Retail Trade ranks ~~9th~~ ninth in total payroll at ~~\$110.26~~ billion, ~~also behind Construction at \$11.2 billion.~~

The highest wage industries in the state are ~~Management of Companies~~ Utilities with annual average wages of just ~~over under~~ \$1343,750, followed by ~~Management of Companies and Finance & Insurance and Utilities, both around at~~ \$130,000 and \$120,000 per year, ~~respectively,~~ and then ~~Mining and Professional & Technical Services and Information, which both hover close to are above~~ \$1105,000. In contrast, the lowest wage industries include Accommodation & Food Services at ~~\$25,250~~ 27,664, Retail Trade at ~~\$37,500~~ 39,000, Other Services at ~~\$43,500~~ 48,412, and Arts, Entertainment & Recreation at just under ~~\$45,000~~ 50,544 per year.

Due to COVID-19, Minnesota lost ~~416,000~~ 384,500 jobs from February through April 2020, but has since recovered ~~424,200~~ 525,500 jobs as of ~~October-November 2025~~ 3, which brings Minnesota to ~~100~~ 104.83% of the number of jobs prior to the Pandemic Recession on a ~~non-~~ seasonally adjusted basis. ~~The private sector lost 385,900 jobs from February through April 2020, but has regained 398,100 jobs as of October 2023.~~

~~Sixteen of 20 industries added jobs from 2022 to 2023, leading to a gain of more than 50,000 jobs in the past year, a 1.8% increase. With that growth, 10 of 20 industries now have more jobs now than prior to the pandemic. The industries that have performed the best include Professional & Technical Services, Construction, Health Care & Social Assistance, Wholesale Trade, and Transportation & Warehousing, which have combined to add more than 32,000 jobs since 2019. Twelve of 20 industries have added jobs from 2019 to 2025, led by Health Care & Social Assistance, Construction, Public Administration, Educational Services, and Professional & Technical Services. In contrast, just 8 of 20 industries added jobs over the past year, from 2024 to 2025, again led by Health Care & Social Assistance, Construction, Educational Services, and Public Administration. In both time periods, the largest job losses were suffered in Administrative Support & Waste Management Services, Finance & Insurance, Manufacturing,~~

Information, and Accommodation & Food Services. All of those have still not recovered from Pandemic Recession losses.

In contrast, even with a strong job recovery from 2022 to 2023, the industries that are farthest away from their pre-pandemic level include Accommodation & Food Services, Retail Trade, Finance & Insurance, and Administrative Support & Waste Management Services. Accommodation & Food Services is still down over 9,500 jobs from its 2019 level, while Retail Trade is down about 9,150 jobs. Finance & Insurance did well in the immediate outbreak, but has since continued to cut jobs.

NAICS Code	NAICS Industry Title	Number of Jobs	Change in Jobs Q2 2024 – Q2 2025		Change in Jobs Q2 2019 – Q2 2025	
0	Total, All Industries	2,967,842	10,783	0.4%	48,573	1.7%
11	Agriculture, Forestry, Fishing & Hunting	24,307	202	0.8%	1,366	6.0%
21	Mining	5,845	-112	-1.9%	-128	-2.1%
23	Construction	153,305	4,102	2.7%	15,943	11.6%
31	Manufacturing	315,339	-6,114	-1.9%	-8,555	-2.6%
22	Utilities	14,821	243	1.7%	1,206	8.9%
42	Wholesale Trade	134,116	-979	-0.7%	4,988	3.9%
44	Retail Trade	281,656	-4,426	-1.5%	-11,118	-3.8%
48	Transportation & Warehousing	114,590	-850	-0.7%	4,682	4.3%
51	Information	44,406	-3,004	-6.3%	-6,231	-12.3%
52	Finance & Insurance	136,293	-2,049	-1.5%	-11,923	-8.0%
53	Real Estate & Rental & Leasing	36,079	16	0.0%	475	1.3%
54	Professional & Technical Services	166,537	-1,357	-0.8%	6,723	4.2%
55	Management of Companies	84,349	-2,682	-3.1%	-5,086	-5.7%
56	Admin. Support & Waste Mgmt. Services	121,750	-3,393	-2.7%	-15,556	-11.3%
61	Educational Services	248,089	4,327	1.8%	8,051	3.4%
62	Health Care & Social Assistance	553,364	22,195	4.2%	53,337	10.7%
71	Arts, Entertainment & Recreation	59,339	1,760	3.1%	3,820	6.9%
72	Accommodation & Food Services	232,469	-1,692	-0.7%	-6,094	-2.6%
81	Other Services	92,556	-118	-0.1%	454	0.5%
92	Public Administration	148,624	4,713	3.3%	12,218	9.0%

Source: DEED Quarterly Census of Employment & Wages

Long term, Minnesota has been adding jobs at a steady pace, growing nearly 9% and up almost 215,000 jobs from 2013 to 2023, even with the Pandemic Recession. Health Care & Social Assistance accounted for nearly 61,500 net new jobs, or almost 30% of total job growth in the state over the past decade. Construction was the second largest and the fastest growing industry, up more than 38,000 jobs and 35% since 2013. Professional & Technical Services has also seen rapid job growth in the state, adding 32,205 jobs. The biggest declines have been in Information and Real Estate, Rental & Leasing.

Table 2. Minnesota Industry Employment & Wage Trends, 2013–2023

Industry	Q2 2023 Jobs	1-year Trend	Pre-pandemic Change	10-year Trend

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		~~Q2 2022~~ ~~Q2 2023~~		~~Q2 2019~~ ~~Q2 2023~~		~~Q2 2013~~ ~~Q2 2023~~	
		Amt	%	Amt	%	Amt	%
Total, All Industries	2,919,232	+50,374	+1.8%	-37	0.0%	+213,460	+7.9%
Agriculture, Forestry, Fish & Hunt	23,903	+255	+1.1%	+962	+4.2%	+2,638	+12.4%
Mining	5,921	+48	+0.8%	-52	-0.9%	-387	-6.1%
Construction	145,677	+2,366	+1.7%	+8,315	+6.1%	+38,212	+35.6%
Manufacturing	325,997	+3,115	+1.0%	+2,103	+0.6%	+19,010	+6.2%
Utilities	14,432	+772	+5.7%	+817	+6.0%	-39	-0.3%
Wholesale Trade	133,755	+2,185	+1.7%	+4,627	+3.6%	+2,643	+2.0%
Retail Trade	283,622	+1,139	+0.4%	-9,152	-3.1%	-1,792	-0.6%
Transportation & Warehousing	113,804	+1,111	+1.0%	+3,896	+3.5%	+21,018	+22.7%
Information	48,365	N/D	N/D	-2,272	-4.5%	-8,674	-15.2%
Finance & Insurance	141,038	-1,500	-1.1%	-7,178	-4.8%	+1,265	+0.9%
Real Estate & Rental & Leasing	35,529	+202	+0.6%	-75	-0.2%	-4,381	-11.0%
Professional & Technical Services	168,398	+1,517	+0.9%	+8,584	+5.4%	+32,205	+23.6%
Management of Companies	90,400	+3,419	+3.9%	+965	+1.1%	+13,396	+17.4%
Admin. Support & Waste Mgmt.	132,594	-2,767	-2.0%	-4,712	-3.4%	-1,094	-0.8%
Educational Services	238,110	+3,538	+1.5%	-1,928	-0.8%	+7,598	+3.3%
Health Care & Social Assistance	507,063	+15,001	+3.0%	+7,036	+1.4%	+61,489	+13.8%
Arts, Entertainment & Recreation	53,930	+2,431	+4.7%	-1,589	-2.9%	+3,197	+6.3%

Accommodation & Food Services	229,009	+9,434	+4.3%	-9,554	-4.0%	+9,336	+4.2%
Other Services	90,315	+3,313	+3.8%	-1,787	-1.9%	+4,363	+5.1%
Public Administration	137,364	N/D	N/D	+958	+0.7%	+13,459	+10.9%

Source: DEED Quarterly Census of Employment & Wages

After a couple years of rapid growth, wages increased more slowly across most industries, both high- and low-paying, in the past year. ~~After a couple years of rapid growth, wages increased more slowly across most industries in the past year.~~ Across all industries, average annual wages climbed ~~32.61%~~ in the past year, but are still up ~~19.527.9%~~ compared to pre-pandemic levels. Only the ~~Management of Companies and~~ Mining industry ~~saw a decline in wages over the year.~~ In comparison to pre-pandemic wage levels, the biggest increases have encouragingly occurred in some of the lowest-paying industries, such as Arts, Entertainment & Recreation, ~~Information,~~ Administrative Support & Waste Management Services, Other Services, and Accommodation & Food Services. The smallest increases have been in Mining, Retail Trade, Manufacturing, and Educational Services. ~~Management of Companies saw a small decline since 2019.~~

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Wages have increased due to demand for workers. During 2024~~2~~, employers reported nearly ~~185,000 job vacancies~~ ~~120,500 job vacancies,~~ ~~up down~~ nearly ~~420,000~~ from ~~the second quarter of 2019~~ ~~2023~~, but ~~down about 20,000 from the record set in the second quarter of 2024~~ in line with the 127,550 reported in the fourth quarter of 2019, prior to the Pandemic Recession. ~~Job Openings and Labor Turnover Survey~~ (JOLTS) updates from the Bureau of Labor Statistics show that job vacancies have remained high in the state this year as well, with ~~206~~ ~~162,000~~ job openings estimated in ~~September-October~~ of 2025~~3~~.

While vacancies ~~remain near~~ ~~have dropped rapidly from the~~ record levels ~~reached in 2021 and 2022~~, the number of unemployed workers has ~~remained low as workers return to jobs~~ ~~started to climb upwards~~. In ~~second quarter 2023~~ ~~September 2025~~, there were ~~just~~ ~~0.74~~ unemployed persons for each vacancy, meaning that there were more ~~than twice as many~~ open positions ~~than~~ as unemployed individuals in Minnesota. ~~This is the lowest ratio on record, suggesting that the labor market is extremely tight.~~ However, it is edging upward and getting closer to 1-to-1 in 2025, compared to less than 0.5-to-1 across much of the past four years coming out of the Pandemic Recession. The 6.9% Job Vacancy Rate (the ratio of vacancies for every 100 filled jobs) is the third highest on record, behind the peaks set in 2021 when unemployment was at historic lows. The labor force growth so far this year has been helpful but is still not enough to overcome the challenges that many employers are finding when trying to fill open positions.

Statewide, the Health Care & Social Assistance industry had the most job vacancies with ~~more than~~ ~~nearly~~ ~~45,000~~ ~~31,700~~ openings, followed by ~~Accommodation & Food Services with 17,700 postings.~~ Retail Trade with ~~just under~~ ~~28,500~~ ~~17,630~~ vacancies, ~~Accommodation & Food Services with almost 26,000 postings,~~ ~~Educational Services with 8,680 openings,~~ and Manufacturing with ~~about~~ ~~19,000~~ ~~7,750~~ vacancies, and Educational Services with just over 13,000 openings. Combined, those five industries account for over two-thirds (~~69.3%~~) of the total openings in the state (see Table 3).

Table 3. Minnesota Job Vacancies by Industry, ~~Qtr. 2-2022~~ ~~2024~~

Industry	Number of Job Vacancies	Job Vacancy Rate	Percent Part Time	Requiring Post-Secondary Education	Requiring 1 Plus Years Experience	Median Wage Offer
Total, All Industries	120,448	4.3%	28%	36%	44%	\$20.67
Health Care & Social Assistance	31,699	6.2%	32%	56%	44%	\$23.07
Accommodation & Food Services	17,701	7.8%	37%	0%	25%	\$15.82
Retail Trade	17,630	6.2%	35%	10%	21%	\$16.24
Educational Services	8,680	3.6%	44%	62%	35%	\$22.38
Manufacturing	7,747	2.4%	3%	34%	60%	\$24.97
Professional & Technical Services	6,350	4.3%	14%	85%	83%	\$40.68
Construction	4,717	3.3%	2%	27%	65%	\$28.61
Public Administration	4,446	3.2%	28%	41%	56%	\$22.35
Wholesale Trade	3,980	3.4%	6%	33%	71%	\$23.81
Arts, Entertainment & Recreation	3,722	7.2%	56%	8%	47%	\$16.16
Other Services	3,053	3.7%	35%	37%	33%	\$20.60
Transportation & Warehousing	3,004	2.6%	32%	19%	43%	\$22.93
Finance & Insurance	1,989	1.5%	4%	59%	86%	\$36.54
Management of Companies	1,881	2.2%	21%	69%	75%	\$34.76
Admin. Support & Waste Services	1,586	2.3%	13%	19%	44%	\$20.87
Information	795	1.9%	18%	58%	72%	\$27.12
Real Estate & Rental & Leasing	546	1.6%	22%	65%	79%	\$29.58
Agriculture, Forestry, Fishing & Hunting	460	1.9%	54%	22%	39%	\$20.69
Utilities	362	2.5%	9%	70%	63%	\$29.84
Mining	102	1.7%	0%	32%	58%	\$30.19
Source: DEED Job Vacancy Survey						

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Industry	Number of Job Vacancies	Job Vacancy Rate	Percent Part Time	Requiring Post-Secondary Education	Requiring 1 Plus Years Experience	Median Wage Offer
Total, All Industries	184,588	6.9%	37%	32%	47%	\$18.32
Health Care & Social Assistance	45,230	9.2%	46%	53%	51%	\$20.04
Retail Trade	28,477	10.2%	49%	6%	26%	\$15.70

Accommodation & Food Services	25,894	13.3%	50%	1%	28%	\$15.12
Manufacturing	18,987	6.1%	13%	24%	51%	\$19.99
Educational Services	13,098	5.8%	42%	65%	75%	\$19.23
Professional & Technical Services	7,763	5.4%	15%	73%	82%	\$29.47
Wholesale Trade	5,708	5.1%	9%	49%	69%	\$21.41
Finance and Insurance	5,589	4.0%	9%	60%	93%	\$40.94
Transportation & Warehousing	5,394	5.2%	38%	15%	36%	\$19.94
Construction	5,147	3.7%	2%	17%	65%	\$23.50
Other Services	4,882	6.5%	47%	40%	28%	\$15.09
Administrative & Waste Services	4,822	6.9%	25%	7%	22%	\$17.43
Public Administration	2,909	2.2%	20%	41%	63%	\$21.06
Arts, Entertainment, & Recreation	2,407	5.6%	52%	17%	42%	\$15.10
Agriculture, Forestry, Fish & Hunting	2,287	9.9%	24%	9%	35%	\$16.97
Management of Companies	2,168	2.5%	22%	66%	88%	\$33.25
Real Estate & Rental & Leasing	2,154	6.5%	70%	11%	15%	\$13.97
Information	1,286	3.1%	20%	40%	68%	\$21.66
Mining	242	4.1%	1%	13%	44%	\$20.34
Utilities	143	1.1%	3%	69%	76%	\$29.93

Source: DEED Job Vacancy Survey

Regionally, 66,411 job vacancies, or 56.3% of the statewide total, were located in the seven-county Twin Cities metro area, while the remaining 54,037 vacancies, or 43.7%, were located in Greater Minnesota in 2024. Compared to one year ago, the number of job vacancies decreased by 15.2% in the Twin Cities and 11.0% in Greater Minnesota. As in past years, the job vacancy rate was higher in Greater Minnesota (5.1%) than in the Twin Cities (3.8%), with both regions

[exhibiting more balanced labor markets in 2024 than in 2023. The Twin Cities had a ratio of 0.7 unemployed persons to every one job vacancy, while Greater Minnesota had a slightly higher ratio at 0.8 unemployed persons to every one job vacancy.](#)

[Regionally, 98,330 or 53.3% of all job vacancies were posted in the seven-county Twin Cities metro area, while the remaining 86,258 vacancies, or 46.7%, were located in Greater Minnesota during second quarter 2022. Compared to one year ago, the number of job vacancies decreased by 17.7% in the Twin Cities but remained nearly level in Greater Minnesota. As in past years, the job vacancy rate was higher in Greater Minnesota \(8.4%\) than in the Twin Cities \(6.0%\), with both exhibiting extremely tight labor markets. And just like the state overall, both the Twin Cities and Greater Minnesota have a ratio of 0.4 unemployed persons to every one job vacancy.](#)

Just 36.2% of vacancies required some level of post-secondary education or training beyond high school. This means the other two-thirds of vacancies require no education beyond a high school diploma or [equivalent](#). The percent of job openings requiring post-secondary education has been declining due to the tight labor market, as employers look to expand their applicant pool. In contrast, the percent of vacancies requiring work experience has been increasing over time, with 44.7% requiring one or more years of work experience.

[The median \(50th percentile\) wage offer for all job vacancies is \\$20.67 per hour in 2024. After raising almost \\$1 compared to last year, this is easily the highest median wage offer in the history of the Job Vacancy Survey, reflecting both employers offering higher starting wages and a changing mix of available occupations.](#) The median (50th percentile) wage offer for all job vacancies is \$18.32 per hour. This is easily the highest median wage offer in the history of the Job Vacancy Survey, reflecting both employers offering higher starting wages and also a changing mix of available occupations, with jobs shifting toward higher wage industries. Wage offers are highly correlated with experience and education requirements.

Having a comprehensive understanding of [occupations in demand](#) in Minnesota that considers current job vacancies, the number and types of jobs people have been laid off from, the prevalence of certain occupations in each region, long-term demand projections, and regional differences in labor market supply and demand is critical to helping employers, job seekers, career counselors and educators during these challenging times. In the short-term, to help jobseekers see what jobs are currently available, [CareerForceMN.com](#) publishes a list of [the top 30 jobs that are hiring now](#) – providing a summarized list of postings from Minnesota employers that are showing up on the [National Labor Exchange](#). In addition, job seekers can always rely on the staff, tools, and resources available through [CareerForce locations](#) across the state to get back to work.

As we get a clearer picture of the impact of the pandemic and economic recovery, job seekers and employment counselors looking for more information on how to transition back into the labor market also need to take into account various factors related to labor market supply and demand. While the top 30 list is helpful as a tool for those looking for employment quickly, it includes no analysis; it is simply a count of job postings. DEED's [Occupations in Demand \(OID\) tool](#) was developed to provide a more comprehensive look at current demand for job seekers and career counselors, specifically in the Dislocated Worker program. The [updated OID list](#) is a ranking of occupations that have the most favorable demand conditions as measured by the following factors:

- What jobs are open and available in the region now and have had openings since the start of the pandemic? (Source: Minnesota [Job Vacancy Survey](#))

- How large and prominent is each occupation in the region? (Source: [Occupational Employment & Wage Statistics](#))
- How many people were laid off and how hard has it been to find re-employment in an occupation since the start of the pandemic? (Source: [Unemployment Insurance claims](#) data)

Another key component of the OID demand score is input from analysts in DEED's [Regional Analysis & Outreach Unit](#), which edit the lists based on local knowledge. For example, a [regional analyst](#) has first-hand knowledge of a business opening soon, which will result in numerous job opportunities not yet captured by the Job Vacancy Survey or focus on industries and occupations that have been targeted by local workforce development partners.

Based on this comprehensive set of data, occupations are ranked and split into quintiles based on demand, with 5 stars representing the highest level of demand and 1 star the lowest. Statewide, there are over 110 occupations in the 5-star category and more than 325 occupations in the top three levels of demand. There are also over 200 occupations in lower demand, including some that might have a number of job postings, though those are offset by even larger numbers of unemployed workers from those occupations. Table 4 displays the top 25 occupations in demand in Minnesota, and the full list of [563-600](#) occupations is found on the [OID tool](#)

Table 4. Top 25 Minnesota Occupations in Demand, 2025

Soc Code	Job Title	Median Annual Wage	Projected 10-year Growth Rate	Projected 10-year Openings	Typical Starting Requirements
311120	Home Health and Personal Care Aides	\$36,814/yr	13.9%	194,236	High school diploma
412031	Retail Salespersons	\$35,687/yr	-0.3%	98,323	High school diploma
353023	Fast Food and Counter Workers	\$32,492/yr	4.2%	132,910	High school diploma
291141	Registered Nurses	\$102,303/yr	5.3%	41,139	Associate's degree
412011	Cashiers	\$32,917/yr	-6.8%	104,277	High school diploma
311131	Nursing Assistants	\$46,353/yr	2.4%	40,057	Postsecondary certificate
351012	First-Line Supervisors of Food Preparation and Serving Workers	\$46,119/yr	7.2%	28,297	High school diploma
537065	Stockers and Order Fillers	\$38,200/yr	8.1%	75,050	High school diploma
533032	Heavy and Tractor-Trailer Truck Drivers	\$61,900/yr	5.8%	48,642	Postsecondary certificate
353031	Waiters and Waitresses	\$24,885/yr	0.1%	78,105	High school diploma
259045	Teaching Assistants, exc. Postsecondary	\$38,702/yr	3.5%	42,230	High school diploma
111021	General and Operations Managers	\$97,140/yr	6.8%	66,950	Bachelor's degree
372011	Janitors and Cleaners	\$38,969/yr	3.8%	67,176	High school diploma
352021	Food Preparation Workers	\$35,410/yr	-6.3%	31,928	High school diploma
411011	First-Line Supervisors of Retail Workers	\$47,814/yr	-5.8%	23,526	High school diploma
537062	Laborers & Freight, Stock & Mat'l. Movers	\$46,043/yr	6.7%	77,036	High school diploma
439061	Office Clerks, General	\$47,578/yr	-3.9%	65,933	High school diploma
499071	Maintenance & Repair Workers, General	\$59,030/yr	4.2%	28,523	High school diploma
151252	Software Developers	\$126,309/yr	24.2%	32,224	Bachelor's degree
434051	Customer Service Representatives	\$48,023/yr	-4.4%	81,511	High school diploma

352014	Cooks, Restaurant	\$38,868/yr	12.1%	45,753	High school diploma
512090	Miscellaneous Assemblers & Fabricators	\$46,394/yr	-4.4%	46,827	High school diploma
292061	Licensed Practical Nurses	\$61,735/yr	3.5%	11,546	Postsecondary
414012	Sales Representatives, Wholesale Mfg.	\$75,860/yr	5.6%	31,410	High school diploma
132011	Accountants and Auditors	\$81,952/yr	5.6%	26,912	Bachelor's degree

Source: DEED Occupational

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Soc Code	Job Title	Median Annual Wage	Projected 10-year Growth Rate	Projected 10-year Openings	Typical Starting Education Requirements
311120	Home Health & Personal Care Aides	\$33,029	+24.1%	+171,243	High school or equiv.
412031	Retail Salespersons	\$32,512	-3.0%	+101,384	High school or equiv.
291141	Registered Nurses	\$87,291	+6.6%	+43,201	Associate's degree
412011	Cashiers	\$29,977	-9.3%	+105,183	High school or equiv.
353023	Fast Food & Counter Workers	\$30,646	+12.4%	+151,605	High school or equiv.
311131	Nursing Assistants	\$40,439	+3.6%	+37,189	Vocational training
537062	Laborers & Freight, Stock & Material Movers	\$41,416	+6.5%	+58,224	High school or equiv.
533032	Heavy & Tractor-Trailer Truck Drivers	\$58,460	+4.1%	+43,441	High school or equiv.
411011	First-Line Supervisors of Retail Sales Workers	\$47,200	-5.9%	+19,635	High school or equiv.
434051	Customer Service Representatives	\$46,307	-4.4%	+68,803	High school or equiv.
372011	Janitors & Cleaners	\$37,168	+5.9%	+60,938	High school or equiv.
537065	Stockers & Order Fillers	\$36,317	+2.9%	+64,838	High school or equiv.
351012	First-Line Supervisors of Food Prep Workers	\$40,136	+17.8%	+26,222	High school or equiv.

353031-	Waiters & Waitresses-	\$24,353-	+17.4%	+71,182-	High school or equiv.-
259045-	Teaching Assistants, Except Postsecondary-	\$38,069-	+7.6%	+36,287-	High school or equiv.-
292061-	Licensed Practical & Vocational Nurses-	\$56,356-	+6.6%	+12,178-	Vocational training-
499071-	Maintenance & Repair Workers, General-	\$50,729-	+4.6%	+22,553-	High school or equiv.-
439061-	Office Clerks, General-	\$45,119-	-3.3%	+53,694-	High school or equiv.-
512090-	Miscellaneous Assemblers & Fabricators-	\$40,914-	-8.4%	+29,512-	High school or equiv.-
352021-	Food Preparation Workers-	\$32,590-	-4.4%	+15,680-	High school or equiv.-
352014-	Cooks, Restaurant-	\$37,826-	+45.9%	+48,448-	High school or equiv.-
436014-	Secretaries & Administrative Assistants-	\$48,270-	-9.4%	+32,990-	High school or equiv.-
111021-	General & Operations Managers-	\$90,481-	+6.9%	+38,082-	Bachelor's degree-
414012-	Sales Representatives, Wholesale & Mfg.-	\$76,857-	+2.9%	+31,987-	High school or equiv.-
372012-	Maids & Housekeeping Cleaners-	\$34,931-	+4.9%	+29,521-	High school or equiv.-

Source: DEED Occupations in Demand

In addition to displaying the OID scores, the OID tool also includes employment projections supplied by the [Employment Outlook](#) program, wage data from [Occupational Employment & Wages Statistics](#), information on the [typical education \(or degree\) or training required](#), and details on related training programs offered around the state. This information helps the end user determine if the job is attractive to them and what additional skills or training might be necessary to obtain it.

Efficient and successful labor markets require economic and workforce development partners that react quickly to changing supply and demand factors. Employers benefit from attracting and hiring from a large pool of qualified workers while job seekers and their

counselors need access to reliable information about occupational demand, wages and trends to move careers in the right direction. In addition, local education institutions should also be working to help provide an appropriate supply of qualified workers to fill local business needs by adapting their program offerings to local occupational demand conditions. [Each planning region](#) has its own set of specific occupations in demand.

ii. Emerging Demand Industry Sectors and Occupations

~~After three long years dealing with and recovering from COVID-19, employment in Minnesota is expected to continue growing in both the short term and the long term, according to projections from DEED. This included the recent period of recovery to get back to pre-pandemic employment levels, followed by continued economic expansion as businesses resume previous growth patterns.~~

Unfortunately, much uncertainty remains in the economy, the labor force, and the world, but our outlook is still positive and pointed toward recovery. Despite the unknowns, we expect that our state will continue to see strong recovery and job growth in the future. To that end, our [10-year projections](#) are designed to provide details on employment prospects in various industries and occupations. These projections of future job growth are widely used in career guidance, in planning education and training programs, and in workforce development efforts in both the private and public sectors.

Minnesota's employment outlook relies on national industry and occupational projections produced by the Bureau of Labor Statistics (BLS). Along with most other states, Minnesota customizes these national projections to reflect state-specific industrial, occupational, demographic, and labor market trends and characteristics. Historical employment trends for 290 industries in Minnesota were compared to corresponding national industry employment trends using statistical techniques and then projections were created and analyzed through Projections Management software.

Table 5. Minnesota Industry Employment ~~Statistics~~[Projections](#), 2022-2032

Industry	Estimated Employment 2022	Projected Employment 2032	Percent Change 2022-2032
Total, All Industries	3,135,681	3,280,273	4.6%
Health Care and Social Assistance	482,631	523,906	8.6%
Manufacturing	323,919	334,924	3.4%
Retail Trade	281,360	278,246	-1.1%
Educational Services	236,349	242,662	2.7%
Accommodation and Food Services	211,568	222,473	5.2%
Self-Employed and Unpaid Family Workers	204,312	203,332	-0.5%
Public Administration	196,782	200,737	2.0%
Professional and Technical Services	166,480	183,334	10.1%
Finance and Insurance	156,293	162,063	3.7%
Construction	133,130	143,291	7.6%
Wholesale Trade	131,627	141,239	7.3%
Administrative and Waste Services	133,432	137,662	3.2%
Other Services, Ex. Public Admin	112,983	116,906	3.5%
Transportation and Warehousing	101,547	109,602	7.9%
Management of Companies and Enterprises	87,198	93,580	7.3%

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Arts, Entertainment, and Recreation	52,793	58,123	10.4%
Information	45,517	48,292	6.1%
Real Estate and Rental and Leasing	35,160	36,276	3.2%
Agriculture, Forestry, Fishing & Hunting	24,620	25,450	3.4%
Utilities	12,332	12,284	-0.4%
Mining	5,648	5,891	4.3%
Source: DEED Employment			

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Industry	Estimated Employment 2020	Projected Employment 2030	Percent Change 2020- 2030	Numeric Change 2020- 2030
Total, All Industries	2,975,300	3,145,200	+5.7%	+169,900
Health Care & Social Assistance	473,914	533,729	+12.6%	+59,815
Accommodation & Food Services	172,515	208,244	+20.7%	+35,729
Professional & Technical Services	154,228	170,931	+10.8%	+16,703
Arts, Entertainment & Recreation	39,891	53,804	+34.9%	+13,913
Other Services	106,083	118,291	+11.5%	+12,208
Educational Services	229,788	241,644	+5.2%	+11,856
Administrative Support & Waste Mgmt. Svcs.	120,228	129,573	+7.8%	+9,345
Transportation & Warehousing	103,467	110,041	+6.4%	+6,574
Construction	123,927	129,479	+4.5%	+5,552
Finance & Insurance	159,797	164,617	+3.0%	+4,820
Manufacturing	309,108	313,098	+1.3%	+3,990
Public Administration	184,485	188,472	+2.2%	+3,987
Wholesale Trade	124,780	126,800	+1.6%	+2,020
Management of Companies	86,958	87,685	+0.8%	+727
Information	43,138	43,734	+1.4%	+596
Real Estate & Rental & Leasing	33,760	33,693	-0.2%	-67

Mining-	5,474-	5,318-	-2.9%	-156-
Agriculture, Forestry, Fishing & Hunting-	24,004-	23,750-	-1.1%	-254-
Utilities-	11,898-	10,501-	-11.7%	-1,397-
Retail Trade-	276,316-	263,653-	-4.6%	-12,663-

Source: DEED 2020-2030 Employment Outlook

However, even if it were to add nearly 36,000 jobs from 2020 to 2030 as projected, Accommodation & Food Services would still not be back to pre-pandemic employment levels. Many jobs in this industry had been hard to fill for years even prior to the pandemic, and became even more so coming out of it, and are also at long-term risk of automation. Restaurants are projected to regain almost 26,000 jobs over the next 10 years, while Accommodation is expected to add about 4,200 jobs.

The Health Care & Social Assistance industry is expected to again lead Minnesota's economy over the next decade, projected to add nearly 601,275,000 jobs through 2032. That would be well above the pre-pandemic peak around 500,000 jobs and make it the third fastest growing industry overall. However, there are structural shifts occurring in the health care system that differ from past projections. The next decade is likely to feature rapid growth in Social Assistance – primarily Individual & Family Services, which includes Child & Youth Services, Services for the Elderly & Persons with Disabilities, and Social Service, Welfare, Rehabilitation, & Drug Addiction & Substance Abuse Counseling – along with the more traditional growth in Ambulatory Health Care Services, Hospitals, and Nursing & Residential Care Facilities. But while we forecast rapid growth at Community Care Facilities for the Elderly and Residential Mental Health Facilities, there is continued decline projected for Nursing Care Facilities, which have struggled with retention and recruitment of workers throughout the pandemic.

Professional, Scientific & Technical Services – most notably Computer Systems Design & Related Services and Management & Technical Consulting Services – are projected to benefit from the technological advancements and the shift to telework experienced throughout the pandemic. But every subsector in this industry from Accounting & Bookkeeping Services to Scientific Research & Development Services are projected to grow over the decade, creating new high-paying career opportunities in the state.

The same cannot be said for every subsector in Manufacturing, though the industry overall is now projected to add another 3,990,100 jobs through 2032. At a detailed level, projections show growth in the Food, Fabricated Metal Product, Electronic Instrument & Medical Device, Chemical & Pharmaceutical, Machinery, and Nonmetallic Mineral Product Manufacturing subsectors. Instead, the state is projecting continuing job losses in areas like Printing & Related Support Activities, Paper Manufacturing, Textile Product Mills & Apparel Manufacturing, and Computer & Electronic Product Manufacturing.

As consumer behaviors changed and online shopping became even more prevalent, Retail Trade lost nearly 17,000 jobs from 2019 to 2020. Though demand for workers in these brick-and-mortar settings has returned in the short-term, Retail is projected to lose more than 12,600,100 jobs over the decade, the most of any sector by nearly a factor of 10. Likewise, the fastest job decline is expected in Utilities, which had been seeing a slower but steady shift toward lower employment over the past decade even before the pandemic recession and will continue to cut jobs across the state.

Shifts in staffing patterns over the 2020-2030 period across industries are projected as part of the BLS national projections, with trends and analysis identifying which occupations within an industry are likely to be increasing or decreasing as a percent of total industrial employment. Staffing patterns for Minnesota industries are developed from estimates collected through the [Occupational Employment & Wage Statistics \(OEWS\) program](#). Eighteen-Twenty of 22 occupational groups are expected to experience employment growth over the next 10 years in Minnesota (see Table 6).

Table 6. Minnesota Occupational Employment Projections, 2020-2030

SOC Code	Occupation	Estimated Employment 2022	Projected Employment 2032	Percent Change 2022-2032	Numeric Change 2022-2032
0	Total, All Occupations	3,135,681	3,280,273	4.6%	144,592
430000	Office & Administrative Support	368,610	351,220	-4.7%	-17,390
410000	Sales & Related	262,030	261,816	-0.1%	-214
110000	Management	239,982	257,186	7.2%	17,204
530000	Transportation & Material Moving	237,336	253,423	6.8%	16,087
350000	Food Preparation & Serving Related	228,621	237,653	4.0%	9,032
130000	Business & Financial Operations	215,256	229,447	6.6%	14,191
510000	Production	210,311	211,373	0.5%	1,062
290000	Healthcare Practitioners & Technical	192,621	208,138	8.1%	15,517
310000	Healthcare Support	173,333	193,318	11.5%	19,985
250000	Educational Instruction & Library	176,944	185,166	4.6%	8,222
470000	Construction & Extraction	135,651	144,815	6.8%	9,164
490000	Installation, Maintenance, & Repair	111,174	118,096	6.2%	6,922
150000	Computer & Mathematical	100,293	115,354	15.0%	15,061
370000	Building & Grounds Cng. & Maint.	96,447	100,446	4.1%	3,999
390000	Personal Care & Service	80,819	87,343	8.1%	6,524
210000	Community & Social Service	68,327	73,857	8.1%	5,530
170000	Architecture & Engineering	59,330	65,195	9.9%	5,866
270000	Arts, Design, Entertainment & Media	59,871	62,314	4.1%	2,443
330000	Protective Service	49,724	51,250	3.1%	1,526
190000	Life, Physical & Social Science	31,028	33,527	8.1%	2,499
230000	Legal	21,858	23,119	5.8%	1,261
450000	Farming, Fishing & Forestry	16,115	16,217	0.6%	102

Source: DEED Employment

Industry	Estimated Employment 2020	Projected Employment 2030	Percent Change 2020-2030	Numeric Change 2020-2030	Labor Force Exit Openings
Total, All Occupations	2,975,300	3,145,200	+5.7%	+169,900	1,299,528
Healthcare Support	165,026	195,744	+18.6%	+30,718	110,552

Food Preparation & Serving Related	~~196,413~~	~~230,396~~	~~+17.3%~~	~~+33,983~~	~~162,071~~
Personal Care & Service	~~85,350~~	~~97,909~~	~~+14.7%~~	~~+12,559~~	~~57,296~~
Computer & Mathematical	~~103,199~~	~~115,793~~	~~+12.2%~~	~~+12,594~~	~~22,665~~
Community & Social Service	~~65,252~~	~~72,662~~	~~+11.4%~~	~~+7,410~~	~~23,361~~
Education, Training, & Library	~~164,751~~	~~178,355~~	~~+8.3%~~	~~+13,604~~	~~70,050~~
Arts, Design, Entertainment & Media	~~50,051~~	~~54,147~~	~~+8.2%~~	~~+4,096~~	~~19,503~~
Healthcare Practitioners & Technical	~~192,413~~	~~207,998~~	~~+8.1%~~	~~+15,585~~	~~50,559~~
Legal	~~22,327~~	~~23,964~~	~~+7.3%~~	~~+1,637~~	~~6,339~~
Transportation & Material Moving	~~217,673~~	~~233,084~~	~~+7.1%~~	~~+15,411~~	~~106,855~~
Life, Physical, & Social Science	~~28,259~~	~~30,029~~	~~+6.3%~~	~~+1,770~~	~~5,840~~
Business & Financial Operations	~~194,738~~	~~206,660~~	~~+6.1%~~	~~+11,922~~	~~52,881~~
Protective Service	~~46,767~~	~~49,561~~	~~+6.0%~~	~~+2,794~~	~~21,676~~
Building, Grounds Cleaning & Maintenance	~~88,554~~	~~93,911~~	~~+6.0%~~	~~+5,357~~	~~52,792~~
Management	~~225,287~~	~~237,754~~	~~+5.5%~~	~~+12,467~~	~~67,446~~
Architecture & Engineering	~~55,462~~	~~58,392~~	~~+5.3%~~	~~+2,930~~	~~13,817~~
Construction & Extraction	~~120,028~~	~~124,959~~	~~+4.1%~~	~~+4,931~~	~~36,430~~
Installation, Maintenance, & Repair	~~105,222~~	~~109,437~~	~~+4.0%~~	~~+4,215~~	~~33,714~~
Production	~~205,773~~	~~205,003~~	~~-0.4%~~	~~-770~~	~~76,945~~

Farming, Fishing, & Forestry	16,818	16,596	1.3%	222	6,965
Sales & Related	272,390	265,840	2.4%	6,550	137,391
Office & Administrative Support	353,547	337,006	4.7%	16,541	164,380

Source: DEED 2020-2030 Employment Outlook

Occupational growth in Minnesota will be led by Healthcare Support, which is also the fastest growing occupational group at the national level. In sum, health care related occupations account for 12 of the top 50 fastest growing jobs in the state, and demand for health care services will continue to drive projected employment growth. Management, Transportation & Material Moving, Healthcare Practitioners, Computer & Mathematical, and Business & Financial Operations occupations, which are all projected to add between 14,000 and 20,000 net new jobs.

As presented above, projected employment growth can be viewed from two perspectives – percent change and numeric change. Some occupations, which have relatively small numbers of workers in 2020, are projected to grow rapidly over the next 10 years but will add relatively few new jobs. Other occupations which start with a large number of workers in 2020 but are projected to grow slower than overall employment growth will still add large numbers of workers by 2030. The distinction between occupations with fast employment growth and occupations expected to add the most jobs is apparent when the 25 fastest growing occupations are compared to the 25 occupations expected to add the most jobs (Table 7). Just nine jobs make it onto both lists, as highlighted in bold.

Table 7. Top 25 Largest Growing Jobs in Minnesota, 2020-2030

SOC Code	Occupation	Estimated Employment 2022	Projected Employment 2032	Percent Change 2022-2032	
0	Total, All Occupations	3,135,681	3,280,273	4.6%	
311120	Home Health & Personal Care Aides	113,680	129,518	13.9%	15,838
151252	Software Developers	38,586	47,917	24.2%	9,331
111021	General & Operations Managers	76,003	81,174	6.8%	5,171
537062	Laborers & Freight, Stock, & Material Movers	55,001	58,697	6.7%	3,696
291141	Registered Nurses	68,044	71,631	5.3%	3,587
537065	Stockers & Order Fillers	42,972	46,442	8.1%	3,470
131161	Market Research Analysts & Marketing Specialists	23,922	27,224	13.8%	3,302
352014	Cooks, Restaurant	26,771	30,013	12.1%	3,242
172112	Industrial Engineers	18,230	21,256	16.6%	3,026
119111	Medical & Health Services Managers	10,914	13,760	26.1%	2,846
472061	Construction Laborers	34,043	36,878	8.3%	2,835

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113031	Financial Managers	17,230	20,047	16.3%	2,817
533032	Heavy & Tractor-Trailer Truck Drivers	43,181	45,681	5.8%	2,500
291171	Nurse Practitioners	5,573	8,013	43.8%	2,440
353023	Fast Food & Counter Workers	56,029	58,362	4.2%	2,333
131111	Management Analysts	24,979	27,284	9.2%	2,305
414012	Sales Representatives, Wholesale & Manufacturing	32,733	34,561	5.6%	1,828
132011	Accountants & Auditors	32,077	33,877	5.6%	1,800
533033	Light Truck or Delivery Services Drivers	19,470	21,242	9.1%	1,772
372011	Janitors & Cleaners	46,154	47,890	3.8%	1,736
319092	Medical Assistants	12,177	13,775	13.1%	1,598
113021	Computer & Information Systems Managers	10,556	12,112	14.7%	1,556
499041	Industrial Machinery Mechanics	6,713	8,086	20.5%	1,373
373011	Landscaping & Groundskeeping Workers	21,836	23,208	6.3%	1,372
131082	Project Management Specialists	17,037	18,391	7.9%	1,354

Source: DEED Employment Projections

Occupational Title	Estimated Employment 2020	Projected Employment 2030	Percent Change 2020-2030	Numeric Change 2020-2030
Total, All Occupations	2,975,300	3,145,200	+5.7%	+169,900
Home Health & Personal Care Aides	107,496	133,419	+24.1%	+25,923
Cooks, Restaurant	21,685	31,629	+45.9%	+9,944
Fast Food & Counter Workers	66,583	74,855	+12.4%	+8,272
Software Developers & Software Quality Assurance	33,284	40,994	+23.2%	+7,710
Waiters & Waitresses	31,369	36,813	+17.4%	+5,444
Registered Nurses	71,782	76,538	+6.6%	+4,756
Passenger Vehicle Drivers, exc. Bus Drivers	17,498	21,777	+24.5%	+4,279
Bartenders	14,149	18,000	+27.2%	+3,851
Market Research Analysts & Marketing Specialists	17,291	20,542	+18.8%	+3,251
General & Operations Managers	41,540	44,400	+6.9%	+2,860
Teaching Assistants (Paraprofessionals)	35,378	38,075	+7.6%	+2,697

Laborers & Freight, Stock, & Material Movers, Hand-	~~41,147~~	~~43,817~~	~~+6.5%~~	~~+2,670~~
First-Line Supervisors of Food Prep & Serving Workers-	~~14,789~~	~~17,416~~	~~+17.8%~~	~~+2,627~~
Janitors & Cleaners-	~~42,824~~	~~45,348~~	~~+5.9%~~	~~+2,524~~
Financial Managers-	~~16,009~~	~~18,487~~	~~+15.5%~~	~~+2,478~~
Medical & Health Services Managers-	~~8,326~~	~~10,751~~	~~+29.1%~~	~~+2,425~~
Management Analysts-	~~20,543~~	~~22,816~~	~~+11.1%~~	~~+2,273~~
Hairdressers, Hairstylists, & Cosmetologists-	~~12,062~~	~~14,116~~	~~+17.0%~~	~~+2,054~~
Nurse Practitioners-	~~4,107~~	~~5,985~~	~~+45.7%~~	~~+1,878~~
Subs. Abuse, Behavioral & Mental Health Counselors-	~~9,127~~	~~9,987~~	~~+22.9%~~	~~+1,860~~
Preschool Teachers, Except Special Education-	~~9,719~~	~~11,579~~	~~+19.1%~~	~~+1,860~~
Self-Enrichment Education Teachers-	~~9,649~~	~~11,415~~	~~+18.3%~~	~~+1,766~~
Project Management & Business Opers. Specialists-	~~32,909~~	~~34,527~~	~~+5.2%~~	~~+1,718~~
Fitness Trainers & Aerobics Instructors-	~~4,950~~	~~6,633~~	~~+34.0%~~	~~+1,683~~
Amusement & Recreation Attendants-	~~6,453~~	~~8,119~~	~~+25.8%~~	~~+1,666~~

Source: DEED 2020-2030 Employment Outlook

Job prospects tend to be better in occupations that are growing, but new jobs created by growth are only a fraction of the total number of future openings across occupations. The opportunity to get a job in a particular occupation also depends on how many workers are leaving the occupation and how many other job seekers are considering the same career. Though we've mostly focused on recovery and growth thus far, projections data show that job openings created by workers leaving the labor force or transferring to a different occupation will far exceed openings generated by employment growth.

The number of new jobs created is expected to be around ~~170~~145,000 jobs over the course of the decade, while the number of jobs that will become open due to labor market exits is close to 1.53 million! For example, many of the ~~more than~~nearly ~~217~~237,500 people currently working in Transportation & Material Moving occupations in 202~~20~~ will still be working in those jobs in 203~~20~~, but many others will have retired or transferred to another occupation over the next ten years, thereby creating labor market exit and occupational transfer openings for new workers. While we are projecting a gain of more than 1~~65~~,000 new Transportation & Material Moving

jobs by 2032, we may also need more than 106,129,000 workers to fill existing jobs that become available due to retirements or other labor force changes.

On that note, the second largest number of labor market exit openings are projected for Office & Administrative Support occupations, which are projected to see the largest decline – but will still offer nearly 165,192,000 job openings for interested job seekers. Likewise, the state will have significant demand for replacement openings in Food Prep & Serving, Sales & Related, Healthcare Support, Transportation & Material Moving, Production, Management, and Education, Training & Library occupations. Even in fast growing Computer & Mathematical occupations group, labor force exits account for two-thirds (60%) of total openings; and average over 88% of total openings across all occupations.

In sum, Minnesota's total employment is projected to climb 5.7% over the 2020-2030 period, compared to projected U.S. employment growth of 7.7% over the same time period. Minnesota's employment growth trailed the U.S. pace during the previous 10 years and will most likely continue to lag behind national growth rates unless the labor force is able to grow more than currently projected. Projections are available for each of the planning regions in the state as well. -

Unfortunately, Minnesota's job growth is still projected to be constrained by our tight labor market unless there is significant expansion of the number of available workers in the state with the right skills.

The state is expected to add nearly 170,000 new jobs over the decade and may also have up to 1.3 million labor market exit openings, creating a multitude of opportunities for workers in Minnesota. Fifteen of the 20 main industries are expected to see job growth or recovery during that time frame, again led by Health Care & Social Assistance but also boosted by recovery in Leisure & Hospitality and Other Services. Likewise, most occupational groups and occupations are expected to see job gains, but even more will have demand due to replacement openings.

iii. Education and Skill Levels of the Workforce

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

i. Employment and Unemployment

In October of 2023, Minnesota employers reported 3,001,300 jobs, the highest number of jobs ever recorded and the first time when the seasonally adjusted monthly jobs estimate has ever surpassed 3 million. After three years of recovery from the COVID-19 Pandemic Recession of 2020, the state finally surpassed pre-pandemic employment levels earlier in 2023 and is showing signs of continuing growth.

Over the year, Minnesota's job gains are slower now faster than the U.S. growth rate, and but much like the past five years, the state's labor market tightness has constrained even faster economic growth. From the end of the Great Recession in early 2010 until March of 2020, the state's economy continued to reach new employment peaks each year in the longest running economic expansion on record. Even then, however, the state's steady – but slowing – labor force growth constrained even more potential job growth over the decade. Essentially, if we had more workers, we could have filled more jobs.

In fact, DEED's Job Vacancy Survey has revealed a progressively increasing number of vacancies each year since 2010 as employers have struggled to find workers for all their available jobs. This trend continued all the way up to 2020 and is even more pronounced since the Pandemic Recession. With the state's labor force currently still down about 15,000 workers compared to February 2020, Minnesota employers posted nearly 185,000 job vacancies in 2022. That number was up almost 40,000 vacancies above the number in the second quarter of 2019, prior to the pandemic, and up by more than 140,000 vacancies compared to the second quarter of 2010, coming out of the Great Recession.

Since 2017, Minnesota has had more job vacancies than unemployed workers – meaning even if our unemployment rate dropped to zero, we still wouldn't have enough workers to fill all the open jobs in the state. This tight labor market will continue to make it more challenging for employers to grow but will also shine a light on the importance of creating positive employment outcomes for all Minnesotans, including groups that have traditionally faced discrimination and systemic barriers such as communities of color, individuals with disabilities, and immigrants.

Scores of business owners across Minnesota report that finding workers is one of their biggest challenges. Although some of the blame for this problem was placed on the pandemic, the truth is that workforce shortages were already an issue in Minnesota and have been since the end of the Great Recession. People dropped out of the labor force due to the pandemic in 2020, but the long-term reasons for workforce shortages are years of economic growth and an aging workforce heading toward retirement. This is not a short-term problem, but rather a long-term problem that will need various strategies if we are to overcome it.

According to data from DEED's Local Area Unemployment Statistics program, Minnesota had an average of just over 3.1 million 3,150,000 workers through the first 10-11 months of 2023. That was about 425,500 fewer workers than in 2019, but was about 256,514 more workers compared to 2022. Data show that every region gained workers so far in 2023, with Southeast, the Twin Cities and Central seeing the fastest increases, and Northeast-Southwest seeing the smallest and slowest increase. However, every region but Northwest still both Northeast and Southwest still have fewer workers now than in 2020-2016 (see Table 8).

Table 8. Labor Force Size by Region in Minnesota, 2014-2016-2023

	Twin Cities Metro	Northwest	Northeast	Southeast	Southwest	Central
2025 Annual Avg.	1,778,094	303,505	160,547	290,598	217,619	410,356
2024 Annual Avg.	1,762,477	301,291	159,353	282,855	216,634	407,199
2023 Annual Avg.	1,756,633	296,821	158,365	278,447	214,290	403,552
2022 Annual Avg.	1,738,189	292,684	156,884	274,779	212,091	395,778
2021 Annual Avg.	1,721,614	292,220	156,179	274,997	211,439	388,839
2020 Annual Avg.	1,761,997	297,807	160,867	281,730	219,828	395,436
2019 Annual Avg.	1,755,346	295,653	161,496	278,984	219,342	394,285
2018 Annual Avg.	1,733,791	293,031	160,723	274,832	218,490	389,644
2017 Annual Avg.	1,724,638	294,584	161,802	274,534	219,524	388,994
2016 Annual Avg.	1,697,984	294,738	162,279	273,734	220,909	383,711
2016-2025	80,110	8,767	-1,732	16,864	-3,290	26,645
	4.7%	3.0%	-1.1%	6.2%	-1.5%	6.9%

Source: DEED Local Area Unemployment Statistics

	Twin Cities Metro Area	Northwest	Northeast	Southeast	Southwest	Central	State of Minnesota
2014 Annual Avg-	1,642,460	297,224	164,194	277,021	218,657	380,247	2,979,798
2015 Annual Avg-	1,653,938	300,940	164,152	279,552	223,463	383,472	3,005,413
2016 Annual Avg-	1,669,746	300,357	163,991	280,925	221,799	386,305	3,023,110
2017 Annual Avg-	1,706,940	301,963	164,498	283,308	221,486	392,816	3,071,005
2018 Annual Avg-	1,714,156	300,359	163,407	283,187	220,354	393,635	3,075,089
2019 Annual Avg-	1,734,928	303,005	164,189	286,922	221,125	398,521	3,108,681
2020 Annual Avg-	1,749,292	306,399	164,055	290,455	222,661	401,304	3,134,160
2021 Annual Avg-	1,688,645	303,530	159,692	284,625	214,988	387,846	3,039,322
2022 Annual Avg-	1,717,199	305,175	161,024	285,282	216,146	392,682	3,077,500
2023 Jan- Oct Avg-	1,733,510	306,937	161,365	287,897	218,253	396,027	3,103,988
2020-2023 Avg-	15,782	+538	-2,690	-2,558	-4,408	-5,277	-30,172

Source: DEED Local Area Unemployment Statistics (LAUS) program

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ii. Labor Market Trends

Looking forward, data show that current population and aging trends will lead to a tight labor market over the next decade as well, with some regions experiencing labor force declines. Applying current labor force participation rates by age group to population projections by age group from the [Minnesota State Demographic Center](#) show that the state would be expected to add just under 4995,000 workers from 2025 to 2035, a 3.03% growth rate over the decade. That would be the smallest amount of labor force growth in a 10-year period and the slowest labor force growth rate in the state when comparing the past three decades and beyond.

This projection includes a sizeable decline in workers from 55 to 74 years of age, as Generation X filters in behind the Baby Boomer generation. However, it also includes huge increases in the number of workers from 20 to 54 years of age, as Millennials and Generation Z replace

Generation X in their prime working years. There is also projected to be some growth in the number of workers aged 75 years and over as Baby Boomers remain in the labor force longer (see Table 9).

Table 9. Minnesota Labor Force Projections, 2025-2035

	2025 Labor Force Projection	2035 Labor Force Projection	2025-2035 Change	
			Numeric	Percent
16 to 19 years	159,211	152,913	-6,298	-4.0%
20 to 24 years	318,651	327,393	8,743	2.7%
25 to 44 years	1,352,489	1,391,793	39,303	2.9%
45 to 54 years	598,668	686,134	87,466	14.6%
55 to 64 years	510,809	470,754	-40,054	-7.8%
65 to 74 years	172,918	167,598	-5,320	-3.1%
75 years & over	30,435	41,236	10,801	35.5%
Total Labor Force	3,143,180	3,237,821	94,641	3.0%
Source: calculated from Minnesota State Demographic Center population projections and 2019-2023 American Community Survey 5-Year Estimates				

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	2025 Labor Force Projection	2035 Labor Force Projection	2025-2035 Change in Workers	2025-2035 Change in Workers
			Numeric	Percent
16 to 19 years	165,227	162,233	-2,994	-1.8%
20 to 24 years	302,995	324,524	+21,530	+7.1%
25 to 44 years	1,362,824	1,392,696	+29,871	+2.2%
45 to 54 years	590,842	692,246	+101,404	+17.2%
55 to 64 years	515,086	466,596	-48,490	-9.4%
65 to 74 years	175,925	169,259	-6,666	-3.8%
75 years & over	28,636	38,831	+10,195	+35.6%
Total Labor Force	3,141,536	3,246,386	+104,850	+3.3%

Source: Calculated from Minnesota State Demographic Center population projections and 2017-2021 American Community Survey 5-Year Estimates

Four-Five of the six regions in the state are projected to add workers, led by more rapid-sizeable growth in the Twin Cities (+24.83%, +77,00050.685 workers) and Central (+54.91%, +16,50024.131 workers), and more-measuredstrong growth expected in Southeast (+3.61%, +8,70010.164 workers) and Northwest (+23.58%, +8,0000.235 workers), and steady growth in Southwest (+1.1%, +2,325 workers). In line with recent trends, both Northeast (-1.46%, -2,500 216 workers) and Southwest (-1.0%, -2,000 workers) are is projected to lose workers from

2025 to 2035. Moving forward, every region's economy and employers will have to deal with these labor force constraints.

To that end, reducing unemployment rate disparities for Black, Indigenous, and People of Color (BIPOC) and immigrants, as well as increasing labor force participation rates for people with disabilities, both younger and older workers, people with lower educational attainment, and other people with barriers would lead to important increases in the size of the state's available labor force.

With a labor force participation rate of 68.29% in 2022, Minnesota is well known for our hard work ethic, ranking 6th highest out of the 50 states and D.C. As noted above, Minnesota has just over 3.15 million workers aged 16 years and over in the labor force, compared to about 1.5 million people aged 16 years and over who are not in the labor force. Almost just over 62% of the workforce is between 25 and 54 years of age, compared to 15% that are 24 years and younger and 23% that are 55 years and older. While prime age workers are still the majority of the labor force, the share is down nearly 3% compared to 2012, when 64.8% of workers were between 25 and 54 years of age. Instead, the percent of workers aged 55 years and over increased more than 2.5% compared to 2012, reflecting the aging workforce in the state. Workforce demographics varied by region, with the Twin Cities, Central, and Southeast having younger populations, and Northeast, Southwest, and Northwest having older populations.

In addition to aging, Minnesota's labor force is rapidly becoming increasingly racially diverse. In 2022, 77.9% of Minnesota's workforce reported white alone as their race, down from 88% in 2012. The number of Black, Indigenous, and People of Color (BIPOC) in Minnesota's labor force increased 72%, nearly doubled over the past decade, an increase of nearly well over 350,000 additional workers. Minnesota now has just under 195,000 Black or African American workers, or 6.27% of the total labor force, up from 133,500 in 2012. The state also has around 175,000 to 210,000 workers who are Asian alone, of Two or More Races, and Hispanic or Latino origin of any race, all accounting for about 5.5% - 6.5% of the total labor force. Every race group other than American Indian & Alaska Native had a higher labor force participation rate than the state's white population; but also had a higher unemployment rate than for whites (see Table 10).

Table 10. Minnesota Labor Force Characteristics, 2022

	Number of Workers	Percent of Total Workers	Labor Force Participation Rate	Unemp. Rate
Total Population 16 years & over	3,114,021	100.0%	68.10%	3.72%
16 to 19 years	462,306	5.32%	54.17%	81.23%
20 to 24 years	304,900	9.78%	83.67%	5.96%
25 to 34 years	662,210	21.13%	89.4%	2.83%
35 to 44 years	683,713	22.50%	89.5%	2.97%
45 to 54 years	577,594	18.76%	89.20%	2.6%
55 to 64 years	537,519	17.43%	72.84%	2.23%

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65 to 74 years	153,172,532,755	45.49%	2627.94%	2.95%
75 years and over	2831,965,060	1.09%	687.3%	392.7%
RACE AND HISPANIC OR LATINO ORIGIN				
White alone	2,4501,192074	7877.28%	66.8%	32.07%
Black or African American alone	194225,201,285	67.12%	6972.0%	827.9%
American Indian & Alaska Native alone	2326,312,051	0.87%	5662.28%	98.3%
Asian alone	1751,963703	5.5%	7674.50%	283.4%
Some other race alone	92,50293,129	23.90%	74.95.6%	6.45%
Two or more races	177,520205,596	576.5%	74.28%	45.4%
Hispanic or Latino origin (of any race)	174,804209,021	56.6%	75.69%	54.2%
DISABILITY STATUS (pop. 20 to 64 years)				
With any disability	180,303193,047	615.8%	5657.54%	8.62%
EDUCATIONAL ATTAINMENT (pop. 25 to 64 years)				
Less than high school graduate	118,895115,745	484.6%	67.49%	6.92%
High school graduate (includes equiv.)	4516,81975	4818.16%	77.95.5%	4.40%
Some college or associate's degree	7875,733953	31.69%	85.84.9%	283.1%
Bachelor's degree or higher	1,141,60400,965	454.7%	90.94%	152.0%

Source: 202[42](#) American Community Survey 1-Year Estimates

Greater Minnesota has less racial diversity than the Twin Cities. While every region in the state saw an increase in the number of jobs held by people of color over the past 20 years, only about 13.1% of jobs in Greater Minnesota are held by people of color, compared to 25.9% in the Twin Cities. Employers across the state will need to tap into the changing demographics of the state's population and labor force, and work to remove systemic barriers to economic success.

Alongside changing racial diversity, [immigration has been key to Minnesota's labor force growth](#). [Minnesota's foreign-born population has grown significantly over the past decade, reaching nearly 490,000 residents in 2023 and comprising 8.6% of the state's total population, according to the U.S. Census Bureau's American Community Survey². This represents a 24.7% increase from 2013, highlighting the state's growing diversity and the important role immigrants play in Minnesota's demographic makeup. Additionally, foreign-born Minnesotans play an outsize role in the state labor force, relative to the total population. As of 2023, almost 11% of Minnesota's workers were immigrants. According to the U.S. Census Bureau's 2021 American Community Survey 5-Year Estimates, Minnesota is now home to almost 480,000 foreign-born residents, or about 9.5% of the total population. The number of immigrants in the state increased 30.6% from 2010 to 2021, compared to a national growth rate of 16%. Immigrants have a much younger age profile than the native-born population.](#)

Immigrants have become critical to Minnesota's economy, providing a rapid stream of new workers in the face of an aging native-born workforce. [Both nationally and in Minnesota, the foreign-born population has higher labor force participation. In Minnesota in 2023 the foreign-born labor force participation rate \(FBLFPR\) of 74.4% was six percentage points higher than the statewide labor force participation rate, which itself was the 6th highest among all states. From 2013 to 2023, the FBLFPR increased while the overall LFPR decreased, meaning the labor force participation gap between the two groups grew in magnitude. In 2013, the average unemployment rate for the foreign-born workforce was 6%, more than two percentage points higher than the overall statewide rate. By 2023, this gap had closed to virtually zero as the foreign-born rate fell to 2.2%, right above the 2.1% overall rate and within the margin of error. Statewide, 74.3% of the foreign-born population aged 16 years and over was actively participating in the labor force, which was higher than the native-born population labor force participation rate. In Minnesota, that equaled about 335,000 available immigrant workers, comprising about 10.7% of the state's total workforce in 2021. And while the state's overall labor force growth was slowing, the number of immigrant workers in the state increased by more than 80,000 workers from 2011 to 2021, a 31.5% increase. In comparison, the native-born workforce expanded by 75,500 workers, a 2.9% increase. In sum, immigrants accounted for half of the state's labor force growth between 2011-2013 and 2023¹.](#)

Minnesotans with disabilities [age 16 and older from 20 to 64 years of age](#) make up about ~~12.9~~[10.2](#)% of the total population but only ~~5.8~~[6.9](#)% of the employed population. [People with disabilities face many obstacles to working](#). Finding suitable work, convincing employers of their value as employees during the hiring process, commuting and transportation, are all significant barriers. In addition, obtaining the accommodations needed to perform their jobs, whether that is personal care assistance, job coaches, accessibility software and hardware or simply accessible facilities, can prove insurmountable for many people and may be exacerbated in certain geographic areas, industries, and labor markets. Despite these obstacles, Minnesotans with disabilities are a critical part of the workforce. Since 2012, Minnesota has added more than ~~56~~[60](#),000 workers with disabilities to the labor force, and the labor force participation rate for people aged 20 to 64 with a disability climbed from 49.4% in 2012 to ~~56~~[57.5](#)~~4~~[4](#)% in 202~~4~~[2](#).

Equity is at the core of DEED's work, so we are deeply committed to advancing Minnesota's economy for everyone. Racial disparities in unemployment, based on inequitable systems, practices and policies, are found in every region throughout the state, making eliminating these disparities an opportunity for growth regardless of location.

C. Comparison of Economic and Workforce Analytical Conclusion. Describe areas of opportunity for meeting hiring, education, and skills needs identified in the economy compared to the assets available in the labor force in the state.

~~DEED's Job Vacancy Survey During 2024, employers in Minnesota reported a total of 120,448 vacancies, down 13.4% from 2023. This is the 11th highest number of vacancies on record in Minnesota going back to 2001. However, it is well down from the previous three years when the economy and labor markets in Minnesota and the nation were bouncing back from the Pandemic Recession. This has revealed a progressively increasing number of vacancies each year since 2010 as employers have struggled to find workers for all their available jobs. This trend continued all the way up to 2020 and is even more pronounced since the Pandemic Recession. With the state's labor force currently still down about 15,000 workers compared to February 2020, Minnesota employers posted nearly 185,000 job vacancies in 2022. That number was up almost 40,000 vacancies above the number in the second quarter of 2019, prior to the pandemic, and up by more than 140,000 vacancies compared to the second quarter of 2010, coming out of the Great Recession.~~

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Since 2017, Minnesota has had more job vacancies than unemployed workers – meaning even if our unemployment rate dropped to zero, we still wouldn't have enough workers to fill all the open jobs in the state. The tight labor market will make it more challenging for employers to grow but will also shine a light on the importance of creating positive employment outcomes for all Minnesotans, including groups that have traditionally faced discrimination and systemic barriers such as communities of color, individuals with disabilities, and immigrants.

Scores of business owners across Minnesota report that finding workers is one of their biggest challenges. Although some of the blame for this problem was placed on the pandemic, the truth is that workforce shortages were already an issue in Minnesota and have been since the end of the Great Recession. People dropped out of the labor force due to the pandemic in 2020, but the long-term reasons for workforce shortages are years of economic growth and an aging workforce heading toward retirement. This is not a short-term problem, but rather a long-term problem that will need various strategies if we are to overcome it.

According to data from DEED's [Local Area Unemployment Statistics](#) program, Minnesota had an average of just over 3.15 million workers through the first 11 months of 2023. ~~That was about 5,000 fewer workers than in 2019, but was about 26,500 more workers compared to 2022. Data show that every region gained workers so far in 2023.~~

To best serve Minnesota businesses, the Department of Employment and Economic Development provides many resources through the Regional Workforce Strategy Consultant team, assigned to the 6 Workforce Development [Areas-Regions](#) of Minnesota. The Workforce Strategy Consultants have developed innovative workforce solutions by aligning resources, facilitating collaboration, convening business leaders, and leveraging expertise in targeted industry sectors that drive economic equity and growth. The Workforce Strategy Consultants team is housed on the "Economic Development" side of the agency at DEED, which is intended

to help create more alignment with programming and efforts to attract and support businesses that typically exist “outside” of the WIOA/federally funded workforce system of states.

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 required⁴ and optional one-stop delivery system partners.***

Minnesota’s Combined State WIOA Plan serves as a guide for Minnesota for continuous improvement of the state’s workforce development system. This plan and its implementation seek to address challenges to the workforce development system and capitalize on opportunities. Challenges include labor force availability; a skills gap; disparities in employment and educational outcomes for populations experiencing workforce system challenges; and the need to remain relevant and useful to job seekers and employers, given their rapidly changing capacities and expectations.

Under WIOA, the activities of the workforce development system are categorized within three areas: 1) Career Services; 2) Training Services and 3) Business Services. The following is a high-level description of these three categories of services, as they are provided in the state of Minnesota and represent all core programs, Combined State Plan programs and optional one-stop delivery system partners.

Career Services — WIOA has 11 required elements for career services, all which support customers to make informed decisions about their career choices and to understand the resources needed and available to assist them with pursuing their goals. Minnesota’s system focuses on providing career information, job seeker services and connections to support services that help individuals find and retain employment.

System partners provide a robust range of workshops, e-learning, one-on-one meetings and other resources to help people prepare for a successful job search. Minnesota’s career services are supported by nationally-recognized labor market information systems and a “Creative Job Search” curriculum, as well as workshops designed for a wide range of needs — including career planning, skills assessment, resume writing,

interviewing [“Leveraging AI to Strengthen Your Job Search”](#) and how to use social media in ~~your~~ [a successful](#) job search. Minnesota’s Unemployment Insurance (UI) division also has laid the groundwork for moving services to the web by creating e-learning courses based on the Creative Job Search curriculum. Resource referrals are also a critical component in connecting job seekers with needed resources. These services are provided throughout the system at CareerForce locations, partner sites and are often augmented by services through non-required titles/partners, such as the public library system, [including in approximately 60 CareerForce Corner Locations in public libraries](#).

DEED provides required and optional training to all core program, Combined State Plan programs and optional one-stop delivery system partners to ensure consistent approaches and quality services for all job seekers. All core programs except for Title II, fully participate in career services, when possible, through collocation at CareerForce locations and other locations determined necessary for serving job seekers. Title II works closely with CareerForce locations to coordinate career services and referrals among the programs for seamless transition for customers. Having a “career and work oriented” context for much of their instruction, including computer literacy, provides strong support for job seekers to transition to services at the CareerForce locations. All other Combined State Plan programs also have direct connections to career services provided to job seekers and program participants through the CareerForce locations. As an example, Temporary Assistance for Needy Families (TANF) services are currently accessible in a majority of CareerForce locations across Minnesota. Post-secondary Perkins V is the only non-direct individual service provider in the Combined State Plan, but the work they produce aligns with the building of career services that support career pathway thinking.

Training Services — Since WIOA implementation, Minnesota has broadened the system’s approach to training services, placing greater emphasis on recognition of work-based and experiential- learning; portable and stackable credentials which lead to a career pathway that supports family sustaining wages. One of the key entry points for many adults and youth is Adult Basic Education, which focuses on a range of educational needs, such as basic literacy and English as a second language; GED preparation; and “bridge” programming that combines basic skills education contextualized for career pathways and preparation for post-secondary training.

As employers are forced by the workforce shortage to hire more people with less experience, they are seeking more support and assistance with providing training on the job to provide existing employees with the opportunity to learn new skills. The state’s Incumbent Worker Training program helps provide employers with these training opportunities.

Minnesota’s post-secondary options are abundant and varied. These opportunities include traditional education; customized training; private training providers; all levels of credentialing; registered apprenticeships and other work-based learning options. With funding dedicated for education and training, system partners use Minnesota’s federal and state training resources, including the state’s general and Workforce

Development Fund, which helps retrain dislocated workers and has funded career pathways programming, increasing the access through community-based organizations who serve targeted populations and returning veterans.

All core programs participate in training services, as allowed by their federal title rules and regulations. Title I-B and Title IV programs support Youth, Adult, Dislocated Workers and individuals with disabilities, often coordinated with state funding and other community-based services to ensure successful alignment and outcomes of educational and employment goals. Title II provides services to Minnesota's most diverse population of any plan partner and plays a strategic role in basic skills attainment and preparation for postsecondary education. Title III, which doesn't allow for occupational training activities, often serves as a first point of entry for the referral process for low-income adults, Dislocated Workers and other targeted populations. Additionally, other Titles and UI refer customers to the career planning services offered by Title III.

As allowed by their federal title rules and regulations, partners in the Combined State Plan participate in the provision of training services. Most of these programs have greater restrictions on the provision of training services but provide the opportunity for co-enrollment and greater reliance on more traditional sources of financial aid for college or other opportunities. Postsecondary Perkins, as a non-direct service provider, is more embedded in the design of postsecondary education, supporting the development of new education and training for emerging occupations and emphasizing nontraditional occupations, to name a few aspects of their role. Minnesota's Eligible Training Provider List, or ETPL, tracks training programs and their eligibility for federal funding.

Business Services — Minnesota's WIOA Plan continues its emphasis on providing services to businesses and has developed performance metrics for these activities. The primary service provided to employers is to help them find workers.

MinnesotaWorks.net, the state's online job bank, allows businesses to post openings with no fee – although processes related to upgrading the platform are underway. At any given time, it has more than 75,000 job postings and more than 25,000 active resumes from job seekers and has the capacity for businesses to be recognized as "veteran friendly", supporting civilian workforce re-entry for Minnesota veterans.

The state along with its many workforce partners work to support and assist employers in their talent attraction and retention efforts whether through workforce planning, innovative workforce solutions, labor market information and training opportunities. Being competitive in today's tight labor market and having the tools employers need to remain up to date in their recruitment and retention efforts, help them to attract and retain a skilled workforce. All core programs participate in and benefit from business services activities.

Although Title III provides a strong basis for all business services activities, all the other core programs utilize and coordinate resources to support this activity. Title I-B programs utilize this information and engage in supplemental activities such as focus groups and specialized career fairs to engage employers and inform the local boards.

Title II business services activities serves to inform curriculum context and direction, to ensure that the basic education being provided serves a broader need of those needing or seeking more immediate employment. Title IV also has business outreach staff to support and promote expanding opportunities for individuals with disabilities.

All other Combined State Plan partners benefit in similar ways from the business services activities. Some of these programs, like postsecondary Perkins V, have business engagement requirements that assist them with program planning and other aspects of training development. Minnesota also has had great success with the veteran's program and strategies that tap into the business services activities. All optional partners have connections to the One-Stop system's career services, training services, and business services through a variety of options. These options include co-location, sharing recruitment information, participating in referral networks, and participating in strategy or service-related activities. These options are designed based on regional presence and access to the services.

Minnesota has worked to enhance focus on business and industry, [including through the establishment of a state-funded Employer Engagement Team, with representatives in Minnesota's six Regional Workforce Development Areas. The team of Employer Engagement Specialists serve as the first point of contact for employers in their region seeking to connect with training program participants and other job seekers in the CareerForce system. In particular, the Employer Engagement Team is tasked with connecting Drive for 5 training program participants with employers with open positions in: the caring professions, education, manufacturing, technology and the trades.](#)

[In 2025, the State Rapid Response Team \(SRRT\) was moved into the DEED CareerForce Division in order to better coordinate work with employers who were laying off workers or considering layoffs with staff who work with job seekers and employers throughout Minnesota. As part of this reorganization, Foreign Labor Certification \(FLC\) staff began reporting to the SRRT Supervisor, to better coordinate work and provide for cross-training of staff to meet the needs of Minnesota employers during busy times of the year for FLC staff including housing inspections. Also as part of this reorganization, the Migrant and Seasonal Farmworker staff reporting structure changed with MSFW staff now reporting to their regional Job Service Supervisor to provide more integrated career exploration and job search services along with other MSFW services. In addition,](#) Employer Navigator duties [continue to be have been](#) assigned to specific staff at all CareerForce locations. These staff are adept at working with [local businesses](#) to meet workforce needs [and work closely with their regional Employer Engagement Specialist to increase effectiveness in serving employers.](#)

To best serve Minnesota businesses [receiving economic development funding](#), the Department of Employment and Economic Development provides many resources through the Regional Workforce Strategy Consultant team, assigned to the 6 Workforce Development [Areas-Regions](#) of Minnesota [who focus on Minnesota businesses that have received Minnesota Investment Fund, Job Creation Fund and other economic development funding.](#) The Workforce Strategy Consultants have developed innovative

workforce solutions by aligning resources, facilitating collaboration, convening business leaders, and leveraging expertise in targeted industry sectors that drive economic equity and growth. The Workforce Strategy Consultants team is housed on the “Economic Development” side of the agency at DEED, which is intended to help create more alignment with programming and efforts to attract and support businesses that typically exist “outside” of the WIOA/federally funded workforce system of states.

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.

Minnesota’s workforce development system has several strengths, one of its greatest being the renewed focus and interest in interagency and local collaboration. Minnesota’s workforce partners have committed to using this State Planning process as a tool to improve the implementation of our workforce development activities described in (A) and those programs outside of the plan as well. The work to come is described throughout this document and will be acted on throughout the course of 2024 – 2027, with the GWDB serving as a convener to support increased coordination and collaboration across the state. Additional specific strengths and weaknesses can be found below.

Strengths

- Minnesota is committed to stronger interagency and local alignment of our workforce system through the One Minnesota Workforce Shortage Goals which will be accomplished under the GWDB, as described in the Executive Summary.
- Many of the most engaged employers in the state are members of local workforce development boards. These boards bring together key partners in developing and implementing workforce solutions and provide a venue for employers to make active and meaningful contributions toward addressing and resolving workforce challenges.
- From entry into the system through One-Stops, to the partnerships with community-based organizations, customers receive career services that are regional or localized to individual labor markets. This is achieved through constant input from regional and local employers through employer engagement and cross-sector partnerships developed primarily through the work of the local workforce development boards.
- Minnesota’s workforce development system providers also represent the growing diversity of our state’s population, with community engagement by local providers enhancing and expanding services to assist with target populations experiencing disparate outcomes based on race, disability, gender or disconnected youth. The employer and community engagement also contribute to the customer-focused design, offering individualized or culturally appropriate approaches. Community engagement efforts in the state have been led primarily by community-based organizations experienced in working with communities

facing systemic barriers to employment, and Local Workforce Development Boards.

- Minnesota’s 2023 legislative session provided historic investments in workforce development programs serving individuals with barriers to employment across each of the state’s agencies providing WIOA programming.
- Minnesota also oversees several key workforce development programs that seek to address the state’s economic disparities. This includes competitive grant programs support nonprofit organizations that provide business assistance to targeted groups including women, People of Color, indigenous people, rural residents, innovative startups, entrepreneurs, inventors and people with disabilities. This includes the new state grants for [Targeted Populations Transformative Career Pathways](#) which aims at supporting community-based organizations, employers, and education and training providers and Drive for 5 focused on closing job vacancies in the state’s top industries, both targeted on underserved populations.
- Focus on finding a job and meeting job seekers “where they are at” – we want to help people who need family sustaining employment to focus on finding a career pathway that best meets their interests and skills.

Weaknesses

- Minnesota’s workforce system is at times seemingly filled with a number of individual workforce programs but not a fully integrated and aligned workforce system. This is being addressed through the new State Plan goals and the One Minnesota Workforce Shortage goals and new Commissioners Committee structure.
- Minnesota has a number of great sector partnerships across the state that are not currently documented or fully aligned with the initiatives coming out of state agencies. This will be addressed through the second State Plan goal throughout 2024 – 2027.
- Need for greater focus on employers – we want to develop tools that assist employers in tapping overlooked job seekers while we increased awareness of our services. We want to help all Minnesota meet their workforce needs, but many employers are not aware of our services.
- MinnesotaWorks.net, the required federal labor exchange, is outdated and not integrated with CareerForceMN.com. This integration is a priority for state staff in 2024 as it will help provide more seamless service online for career services and for employers.

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

DEED's programs and services are delivered through 50 CareerForce locations, online services and eligibility-based programs. DEED also partners with certified service providers, non-profits, and the Minnesota State college and universities system, and Adult Basic Education programs to deliver workforce development programs to all Minnesotans.

Minnesota has a long history of successful participation in national and state initiatives to expand workforce development activities through cross-agency and systems collaboration. As an example, the GWDB takes part in monthly virtual briefings with NGA policy and congressional analysts who provide technical assistance to directors of state workforce development boards and co-create resources and tools to facilitate capacity building for strategic leadership. These peer-to-peer learning opportunities are enhanced by in-person meetings of the NGA's affiliate associations for State Workforce Liaisons and State Workforce Board Chairs, webinars and strategic publications. Minnesota received technical assistance from the National Governors Association on the development of our State, local and regional plan strategy and our 2023 Workforce Summit which included breakout listening sessions on the State's Vision, Goals and Strategies with state program administrators and local workforce board representatives.

Minnesota also has strong internal supports from offices that support workforce development activities through the dissemination of information or evaluation to guide decision-making. These include:

- DEED's Labor Market Information Office and its regional analysts continue to collaborate with local Workforce Boards, DEED staff, and others to provide data and analysis for grant applications, career information tools for customers, and meaningful analysis on the state and regional economies.
- DEED's Performance Management Office, which works throughout the agency to facilitate results-based accountability that is client-focused, impartial, and transparent. The office informs strategic direction by providing data-driven analysis and context to those who use, deliver, and fund the Minnesota economic and workforce development systems.
- The Minnesota P-20 Education Partnership (P-20 Partnership) was created by the Minnesota Legislature to promote policies and systems alignment across Minnesota's primary, secondary, and postsecondary education systems. The GWDB is actively partnering with representatives of the P-20 Partnership on several alignment-focused initiatives, with the P-20 Partnership supporting and helping drive the GWDB's efforts to make progress in this area.
- Minnesota Management and Budget (MMB) serves on the GWDB and is currently supporting an interagency review of workforce development programs to better understand our state's capacity to meet the needs of workers and employers across the state.

B. STATE STRATEGIC VISION AND GOALS

The State Strategic Vision, Goals and Strategies for 2024-2027 were developed by modifying the previous State Plan's Vision, Goals and Strategies in consultation with workforce program administrators, the Governor's Workforce Development Board, the Minnesota Association of Workforce Boards, and the National Governor's Association. The shift in Vision, Goals and Strategies represents a new strategic direction for workforce development in the state, one that is focused on breaking down silos across workforce partners and being more intentional and proactive about the delivery of programs and services to Minnesotans. More information on the rationale behind the updated language can be found below.

1) **VISION. DESCRIBE THE STATE'S STRATEGIC VISION FOR ITS WORKFORCE DEVELOPMENT SYSTEM.**

The updated version has a new focus on workforce partners across the state working toward a set of collective goals of equitably providing workforce development programming for MN employers.

2024-2027 WIOA Strategic Vision: The strategic vision of the One Minnesota Workforce Development Vision is a healthy economy where all Minnesotans have equitable access to a workforce development system in which partners across the state are working toward a collective goal of providing workforce development programs that are responsive to employer needs in in-demand occupations and lead to good jobs with family-sustaining wages.

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.**

2024-2027 WIOA State Plan Goals

1. Increase interagency and local area coordination and alignment around shared goals, maximizing efficiency and coordination of workforce funding and programs and improving system integration, and creating a "no wrong door" approach for individuals or employers engaging in the workforce system.

Goal #1 was modified to recognize a strategic focus on increased interagency and local area coordination and alignment around shared goals. This coordination should result in partners understanding how their individual work contributes to the collective goals, and how the work of each of the partners in the workforce system can meet the needs of individuals and employers. This shared understanding will help reach the "no wrong door" approach which will ensure that our workforce customers – employers and job seekers – will be able to understand and access the full range of workforce services offered in the state whether they engage a CareerForce Center, a community college, or any partner in the system.

2. Build new and support existing employer-led industry-sector partnerships across the state to create or expand responsive and equitable workforce

development programs and career pathways with embedded work-based learning or on-the-job training, including Registered Apprenticeships, focused on closing gaps in participation and representation based on race, ethnicity, disability, gender, veteran status, and age.

3. Goal #2 was modified to provide more emphasis on the importance of developing or expanding sector partnerships to inform workforce development programs, and for there to be a more specific focus on addressing gaps in opportunities in in-demand occupations for underrepresented populations. Create a more inclusive, equitable, accessible, and proactive workforce system to serve all Minnesotans, preparing employers and the current and emerging workforce for the changing nature of work including new and emerging technology, changing labor market demands, and for the state's shifting demographics, including our new Minnesotans.

Goal #3 was modified to have a focus on innovative service delivery with customer-focused design so that our workforce system is more nimble and ready to respond to the changing ways our customers interact with the workforce system. This includes creating ways to better anticipate future workforce needs.

- 3) **PERFORMANCE GOALS. USING THE TABLE PROVIDED IN APPENDIX 1, INCLUDE THE STATE'S EXPECTED LEVELS OF PERFORMANCE RELATING TO THE PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE DESCRIBED IN SECTION 116(B)(2)(A) OF WIOA. (THIS STRATEGIC PLANNING ELEMENT ONLY APPLIES TO CORE PROGRAMS.)**

PERFORMANCE MEASUREMENTS ARE NEGOTIATED ANNUALLY WITH THE US DEPARTMENTS OF LABOR AND EDUCATION. MINNESOTA WILL DEVELOP PROPOSED TARGETS FOR THE APPLICABLE PERFORMANCE MEASUREMENTS FOR PY 24 AND PY 25. THIS STATE PLAN WILL BE UPDATED AS PERFORMANCE TARGETS ARE NEGOTIATED IN EACH PROGRAM YEAR BASED ON THE NEGOTIATION PROCESS WITH THE FEDERAL DEPARTMENTS.

- 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, WHICH MAY INCLUDE EVALUATION FINDINGS, AND OTHER FEEDBACK TO MAKE CONTINUOUS OR QUALITY IMPROVEMENTS.**

The state is in the process of reviewing not just the workforce development programs covered by this State plan, but relevant programs across all agencies to determine where there is opportunity for alignment and collaboration. This work, in addition to the negotiated performance metrics described above, will help inform the assessment measurements the GWDB will be developing in coordination with local and regional

partners to measure the implementation and effectiveness of the vision and each of the goals described in section (b).

STATE STRATEGY

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must consider 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).**

Minnesota is taking a more proactive approach through state and federal funding to support and expand sector partnerships within the state. This is reflected in our second of three State plan goals, to:

- 2) *Build or expand employer-led industry-sector partnerships across the state to create or expand responsive and equitable workforce development programs and career pathways with embedded work-based learning or on-the-job training, including Registered Apprenticeships, focused on closing gaps in participation and representation based on race, ethnicity, disability, gender, veteran status, and age.*

[In 2025 the GWDB adopted a statewide sector partnership strategy to establish a shared model for developing, supporting, and scaling sector partnerships across Minnesota. This strategy supports alignment around partnership scope, core activities, and performance measurement to promote consistency and effectiveness statewide. In doing so, the strategy advances Goal #2 of the WIOA State Plan by expanding employer-led industry-sector partnerships across the state to create or expand responsive and equitable workforce development programs and career pathways.](#)

[The GWDB defines Sector Partnerships as follows:](#)

[In Minnesota, Sector Partnerships are employer-driven collaborations that advance high-quality job opportunities within a specific industry and regional market. Sector Partnerships bring together partners, including a convener who organizes multiple employers, education and training providers, workforce boards, and other partners, as well as applicable labor organizations and community partners. These partnerships align around shared workforce goals and outcomes that strengthen both economic competitiveness and opportunity for workers.](#)

The strategy identifies core partnership activities such as convening employers and relevant local workforce system stakeholders, using labor market data to inform decision-making, aligning education and training with industry demand, and advancing job quality strategies. It also establishes the use of common metrics to assess partnership effectiveness and support continuous improvement. Overall, the statewide sector partnership strategy is intended to strengthen regional collaboration, better align workforce investments, and ensure Minnesota's workforce system remains responsive to employers and workers. The GWDB will continue to develop resources, guidance, and governance structures to support implementation of this strategy.

A crucial part of our state's sector strategy is focused on closing demographic disparities or gaps within each of our sectors of focus for each of the sector partnerships. This is a clear focus of our state's funding for the state's Drive for 5 initiative and is embedded into the workforce plans that have been created or are in the process of being created for each of the IIA funding opportunities.

Minnesota realizes that sector partnerships are a nationally recognized best practice to ensure that the workforce system, including education and training partners, are responsive to employer demands through a unified employer voice on in-demand industry sectors or occupations. The GWDB has been charged with leading the state's overall implementation of the Drive for 5 initiative and sector partner strategy, with the GWDB serving as the coordinator of state partners and best practices for implementation and expansion. As a result, the GWDB has created 5 subcommittees on the GWDB Industry Partnership Committee to address statewide sector-specific concerns. Moving forward, these Subcommittees will also support the development or collection of best practices from around the state and help with identifying or prioritizing initiatives within each of the sectors of focus.

Minnesota is also using the industry or sector partnership model in creating our workforce development plans for the various IIA funding opportunities. The Minnesota CHIPS Workforce Partnership, for example, is using a sector strategies model to inform the manufacturing and construction workforce development work. This starts with conducting an occupational needs assessment, then building out three bodies of work based on that assessment for the most in-demand occupational needs. Those three bodies of work focus on Talent Pipeline Development, Skills Development, and Workplace Development. Talent Pipeline Development will consist of career exploration and exposure activities, especially for those populations underrepresented in manufacturing and construction, while Skills Development will focus on creating or expanding education and training programs, including registered apprenticeship programs (RAPs) for the in-demand occupations that can be scaled to education system partners across the state. Finally, Workplace Development will be focused on the implementation of the Good Jobs Principles, ensuring that employers have the support and resources to not just attract but retain talent. This model is being replicated across other initiatives like Tech Hubs and other IIA-funded initiatives.

As part of our State plan for 2024-2027, we will be expanding our sector partnership initiatives throughout the state and through DEED's strategic activities. This includes the following activities:

- **GWDB Statewide Sector Partnership Mapping and Best Practice Sharing:**
 - *GWDB Committees:* Through the Industry Partnership Committees, the GWDB will be supporting the collection of best practices and identification of statewide sector needs that could be created or expanded to support local sector partnership work.
 - ~~*Defined Sector Partnerships:* The GWDB will be releasing guidance on what constitutes an industry or sector partnership and how to register a partnership with the state to be part of the sector partnership communities of practice. Definitions around Drive for 5 sectors and how to place prioritization on those sectors for partnership expansion or creation will be included as part of this guidance.~~
 - *Sector Partnership Mapping:* While many great initiatives and partnerships already exist across the state, Minnesota lacks a comprehensive database and mapping tool of the geographic and sector diversity of partnerships. The GWDB will be exploring creating an online tool as part of the GWDB website for partners and the public to see where sector partnerships exist across the state.
 - *Best Practice Sharing:* Quarterly meetings led by the GWDB Committee Chairs will bring together representatives from sector partnerships across the state to share best practices, discuss common needs across the partners within the industries or occupations of focus, and inform the GWDB of additional resources or guidance needed from the state.
 - *Sector Partnership Convening:* The GWDB will host convenings on each of the 3 State plan goals as part of achieving these goals over the next four years and gaining broader statewide awareness and adoption of the goals. This includes hosting a convening on the development and implementation of our statewide sector partnership strategy, engaging local and regional sector partnerships from across the state and including those that have recently formed or are expanding as a result of Drive for 5 funding.
 - *Career Pathway Development:* The GWDB will work in partnership with the P-20 Partnership to develop statewide career pathways for each of the Drive for 5 sectors, building from existing best practices from across the state's local and regional partners. These will include information on wages and benefits, skills, competencies and

credentials that are fully portable, stackable and have multiple on-and-off ramps and include work-based learning and on-the-job training opportunities like Registered Apprenticeship Programs.

- State and Local Strategies:

- *Drive for 5 Funds:* The Drive for 5 Initiative will release funding to selected partners in 2024, with the grant funding available over a two-year window. These grant funds are meant to address current job vacancies, but the state will be exploring over this two-year period how to continue and sustain partnerships in the future.
- *Local/Regional Sector Partnerships:* DEED will provide technical assistance as requested for local and regional sector partnerships across the state. Minnesota is using the required WIOA Local and Regional Plan to better identify where partnerships exist and what best practices have been developed or resources are needed to support partners across the state.

- DEED Internal Partners:

- *Business Engagement and Workforce Strategy Consultants:* These divisions within DEED will be formulating a plan to provide more targeted technical assistance to sector partnerships and employers throughout the state.
- *Rapid Response and UI:* Once the GWDB has established a statewide network of sector partnerships, we will create more direct lines of communication for our Rapid Response and Unemployment Insurance teams to be flagging relevant roles subject to layoff or unemployment in the geographic area of each or any relevant sector partnership. We will also explore supporting stronger initial outreach to individuals in those in-demand positions to do skill and competency assessments to align with identified skill and competency needs of the sector partnerships and identify any additional skill or competency development strategies that could be leveraged by the sector partnerships to address immediate job vacancies.

- Interagency and Educational Alignment: This includes working across partners at DEED and state agencies like DLI to incorporate registered apprenticeship programs into the sector partnership strategies, with the P-20 Partnership to support development state-wide career pathways which can be used by sector partnerships to inform their local or regional education and training efforts as described above. This includes secondary and postsecondary career and technical education programs and the Minnesota State system for creating or expanding academic and training offerings.

- 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).

2024-2027 WIOA State Plan Strategies

For the state to achieve the One Minnesota Vision for workforce development, each workforce partner across the state should be working toward implementing the Governor's major workforce priorities in a unified manner. For the 2024-2027 State, Local and Regional plans, plan writers describe how they are implementing any or all of the priorities put forward by the Governor and those requested by DOL and the U.S. Department of Education who oversee and approve the State plans.

The strategies described below are intended to support and advance the coordination of statewide initiatives and strategies and better understand how these strategies can be implemented at a program or local level. This will also help with improving alignment between federally funded and state-funded programs, ensuring that all programs are moving in similar strategic directions.

- [Drive for 5](#): The Drive for 5 Initiative was created to prepare more Minnesotans for high-demand jobs in five occupational categories: technology, the trades, caring professions, manufacturing, and education. State, regional and local plan writers have been encouraged to consider how their programs, local areas, or regions prioritize any or all of the five in-demand sectors.
- [Targeted Populations Transformative Career Pathways](#): This state-wide initiative was created to bring workers who have been overlooked for employment – particularly people of color – into the workforce at family-sustaining wages. State, regional and local plan writers have been encouraged to consider who their program's Targeted Populations are and their plans for providing pathways to family sustaining wages.
- [Office of New Americans \(ONA\)](#): ONA was created to support immigrant and refugee inclusion, reduce barriers to employment, and improve connections between employers and job seekers. State, regional and local plan writers have been encouraged to consider how they will work with ONA to support immigrants and refugees in their programs.
- [Good Jobs Principles High-Quality Jobs Framework: The GWDB adopted a High-Quality Jobs Framework to establish a shared definition and clear set of standards for job quality across Minnesota's workforce system. The framework is intended to guide state and regional workforce strategies.](#)

investments, and sector partnerships toward improving job outcomes for workers while supporting employers' ability to attract, retain, and advance talent. Key Pillars of a High-Quality Job: Compensation & Benefits; Safe & Stable Working Conditions; Equitable Hiring & Career Development; Worker Voice, Empowerment & Respect; and Sector Specific Metrics:

- The U.S. Department of Labor and U.S. Department of Commerce released the Good Jobs Principles to create a shared vision of job quality across workforce partners. State, regional and local plan writers have been encouraged to consider how they will support their employer clients in adopting Good Jobs Principles to provide high-quality employment opportunities and improve retention.
- North Star Promise: Minnesota is implementing a free college program beginning in the fall of 2024. State, regional and local plan writers have been encouraged to examine eligibility criteria as compared to their existing clients and consider how they will account for changes in uses of funds in light of the free college program.
- Individualized Career Services: Career services to job seekers play a critical role in supporting placement and providing more individualized career services as described in section 134(b)(2)(A)(xii) of WIOA are an evidence-based model for improving individual's earnings. State, regional, and local plan writers have been encouraged to describe how they will be utilizing this strategy to improve outcomes for job seekers, and how they may potentially shift funding to career services as funding for workforce training becomes more readily available with the implementation of the North Star Promise Program.
- Attracting and retaining workers: Minnesota continues to face challenges with population growth, which makes attracting and retaining workers all the more important to supporting a healthy and thriving economy in our state. State, regional, and local plan writers have been encouraged to describe what strategies they are implementing to support employers in improving job quality and marketing of job opportunities to support attraction and retention strategies.
- Supportive Services: Providing wraparound or supportive services is critical to ensuring that underrepresented populations or individuals with barriers to employment have access to the resources they need to enroll or complete workforce development programs and are retained in employment. State, regional, and local plan writers have been encouraged to describe how they are providing supportive services, leveraging partnerships to expand access to such services, or potentially shifting resources to provide supportive services as funding for workforce training becomes more readily available

with the implementation of the North Star Promise Program. Please see the [WIOA TEGL](#) for more implementation ideas.

- Ongoing investments in Adult/Dislocated Worker/Youth programs will contribute to key strategies and the achievement of State Plan goals.

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).

1. In Minnesota, the State board, called the Governor's Workforce Development Board (GWDB) carries out this function by supporting the development and implementation of the state's strategic plan and vision for workforce development. This is done through standing committees and subcommittees organized by the GWDB, through supporting the development of statewide focused workforce plans in response to the many federal funding opportunities through the IIA, and supporting the interagency work of achieving the One Minnesota Workforce Shortage Goal of reducing the job vacancy rate in Minnesota. ~~This also includes hosting the now annual Workforce Summit in September of each year which showcases state and local workforce initiatives, best practices, and priorities for achieving the One Minnesota Vision and Goals for workforce development.~~

Operational Structure

The State Board was established prior to the passing of the Workforce Investment Act (WIA) in 1997 and the Board structure was grandfathered in under WIA. With the passing of WIOA, significant changes to the composition and role of the Board have taken place. The duties and structure of the board are laid out in Minnesota Statutes 116L.665. The Governor appoints all members of the Board, with the exception of legislative members. State and local leadership, GWDB staff, and representatives of local areas encourage potential candidates from specific sectors, organizations and regions to apply for open positions in alignment with the state vision.

The GWDB is supported by an ~~Executive~~ [Director who reports to the Governor's office and DEED's Commissioner and Chief of Staff](#) and ~~4-54~~ full-time staff who are involved in the day-to-day implementation of the key activities and initiatives. The GWDB works with staff across

DEED to support the GWDB Committees, with the goal of having subject matter experts leading and implementing the work and recommendations coming out of each committee. This list of partners includes:

- Industry Sector Partnerships: Chair: Matthew Lewis, Vice President of Partnerships Strategy, Greater MSP; Staff: GWDB
 - Manufacturing: Co-Chairs: Steve Kalina, President & CEO, Minnesota Precision Manufacturing Association (MPMA) & Gabe Mooney, Corporate Project Manager, Central Boiler; Staff: Della Ludwig, Workforce Strategy Consultants, Economic Development Division
 - Caring Professions: Co-Chairs DeLinda Washington, Sr. Vice President & Chief People Officer, Health Partners, Inc. & Nicole Mattson, VP of Strategic Initiatives, Care Providers of Minnesota; Staff: GWDB Shayla Drake, Workforce Strategy Consultant, Economic Development Division
 - Education: Co-Chairs: Troy Haugen, Director of Career and College Readiness, Lake Country Service Cooperative & Jesse Mason, Associate Vice Chancellor for Academic Affairs; Staff: GWDB Rebecca Zoubek, Workforce Strategy Consultant, Economic Development Division
 - Technology: On Pause
 - Trades: Chairs: Sam Heimlich, Business Representative, North Central States Regional Council of Carpenters; Staff: Liz McLoone, Rapid Response Employment & Training Programs, Workforce Division
- State and Local Coordination: Chair: Rob Stark, Financial Advisor, Edward Jones Investments & Vice Chair: Cate Duin, Executive Director, Minnesota Association of Workforce Boards; Staff: Nolan Thomas, GWDB Staff
- Innovative Service Delivery: Chair: Misun Bormann, Director of Talent Strategy and Engagement, Mayo Clinic & Vice Chair: Scott Cummings, Minnesota Market Lead, Accenture; Staff Nolan Thomas, GWDB Staff
- Industry Partnerships:
 - Manufacturing: Co-Chairs: Steve Kalina, President & CEO, Minnesota Precision Manufacturing Association (MPMA) & Gabe Mooney, Corporate Project Manager, Central Boiler; Staff: Della Ludwig and Jessica Miller, Workforce Strategy Consultants, Economic Development Division
 - Caring Professions: Co-Chairs Laura Beeth & Nicole Mattson, VP of Strategic Initiatives, Care Providers of Minnesota; Staff: GWDB
 - Education: Co-Chairs: Troy Haugen, Director of Career and College Readiness, Lake Country Service Cooperative & Naveen Aggarwal, Owner & Founder, Kiddigarten School of Maple Grove; Staff: GWDB
 - Technology: Chair: Jeff Tollefson, President & CEO, Minnesota Technology Association (MnTech); Staff: GWDB
 - Trades: Co-Chairs: Sam Heimlich, Business Representative, North Central States Regional Council of Carpenters, Roy Smith, Director of Talent Development,

[IRRRB/Minnesota State; Staff: Liz McLoone, Rapid Response Employment & Training Programs, Workforce Division](#)

- [Youth Programs](#): Chair: Bernie Burnham, President, Minnesota AFL-CIO, Vice Chair: Hannah Alstead, Political and Labor Director, Teamsters Joint Council 32; Staff: Cory Schmid, Youth Programs Employment & Training Programs, Workforce Division
- [Racial Equity](#): Chair: Linda Sloan, Executive Director, Council for Minnesotans of African Heritage, Vice Chair: Whitney Harvey, Senior Director of Workforce Diversity and Inclusion, Minnesota Chamber of Commerce; Staff: Sonji Davis, GWDB
- [Disability Equity](#): Chair: Josh Berg, Director of Services and Strategic Growth, Accessible Space; Vice Chair: Natasha Jerde, Director, Minnesota State Services for the Blind
- [Future of Work](#): Chair: Rob Stark, Financial Advisor, Edward Jones Investments, Vice Chair: Kevion Ellis, VP of Business & Talent Development, St. Paul Area Chamber; Staff: Nathan Ratner, DEED Government Affairs

Decision-Making Process

The GWDB meets quarterly to discuss and review state policies, programs and initiatives that impact the implementation of the State Vision, Goals and Strategies. Starting in 2024, that will commence with the review of the State plan vote for approval. The GWDB also receives updates and recommendations from the GWDB Committees. The GWDB has an Executive Committee and [five-three](#) standing committees based on member recommendations: [Sector Partnerships](#), [State and Local Coordination](#), [Innovative Service Delivery](#), [Industry Partnerships](#), [Youth Programs](#), [Racial Equity](#), [Disability Equity](#), and the [Future of Work](#), and five subcommittees under the [Industry-Sector](#) Partnership Committees aligned with the Drive for 5 Initiative: Manufacturing, Caring Professions, Education, Technology, and the Trades.

These committees are made up of GWDB members and non-GWDB members that are subject matter experts engaged in the work across the state. The GWDB Committees are tasked with identifying areas with the greatest short-term and long-term needs in their area of focus and identifying best practices as well as potential barriers or solutions to share with the larger GWDB. If necessary, the GWDB will be asked to vote on recommendations coming out of the GWDB committees.

Also starting in 2024, the GWDB will [create a new committee structure for a Commissioner Committee with the Interagency Workforce Alignment \(IWA\) Task Force. As part of the state's goal to increase interagency coordination and alignment, the Governor created a One Minnesota Workforce Shortage Goal team led by Commissioners and their appointees from the Departments of Employment and Economic Development \(DEED\), Labor and Industry \(DLI\), Education \(MDE\), Human Services \(DHS\) Children, Youth and Families \(DCYF\), Health \(MDH\) and the Office of Higher Education \(OHE\). Through the One Minnesota Results process, they identified that a lack of a clear, state agency-wide workforce strategy hampers the ability of the state system to effectively address workforce issues and shortages, too often resulting in duplication of efforts, gaps in workforce services provided to employers and job seekers, and misaligned strategies between agencies. These findings are consistent with feedback the GWDB has received from members and workforce stakeholders across the state. In consultation with members of the Governor's Cabinet Affairs Office, the Goal Leads identified the GWDB as the partner through which stronger interagency alignment could be developed.](#)

[The GWDB Executive Director supports the implementation of system improvements based on the Governor's priorities and recommendations from the IWA and GWDB. The IWA be the primary space for developing internal interagency alignment. The IWA is composed of Commissioners, assistant commissioners, and deputy commissioners as determined appropriate by each agency, as described in the Executive Summary of the State Plan,](#) which also includes the creation of Special Committees, which will support interagency adoption of activities and measures to improve the workforce system.

The GWDB will be undergoing By-Law updates in [2024-2025-2026](#) to reflect the changing structure and committee responsibilities.

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.

Title I

The **Dislocated Worker** program will implement the State Plan vision, goals, and strategies by strengthening partnerships across the state with stakeholders in both the public and private sectors as well as across the agency, encouraging co-enrollment to ensure comprehensive service provision to participants and employers, and supporting innovative service delivery strategies including outreach to underserved populations. A promising practice that will be implemented is the expansion of the eligibility criteria for the state funded component of the program to serve those who could benefit from employment and training services such as those with non-work-related injuries/illnesses. Data from the currently running program called Retaining Employment and Talent After Illness/Injury Network (RETAIN) will be used for empirical evidence to inform the decision. The program will continue to identify opportunities for alignment with state or federal investments in the Bipartisan Infrastructure Law (BIL), the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act (IRA).

Similarly, the **WIOA Adult** program will implement the State Plan vision, goals, and strategies by strengthening partnerships across the state with stakeholders in both the public and private sectors as well as across the agency, encouraging co-enrollment to ensure comprehensive service provision to participants and employers, and supporting innovative service delivery strategies including outreach to underserved populations. A key activity will be collaboration with the Office of Performance and Technical Management, job services, and other departments across the agency to find solutions for workforce shortages by aligning efforts with grantees to engage and serve underserved communities in workforce development areas across the state. The program will continue to identify opportunities for alignment with state or federal investments in the Bipartisan Infrastructure Law (BIL), the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act (IRA).

1) How the State Plan Vision, Goals and Strategies will be implemented by your programs:

The Senior Community Service Employment Program (SCSEP) strategically aligns with Minnesota's 2024-2027 State Plan, integrating its mission to foster a dynamic and inclusive workforce. SCSEP serves as the only program for income-eligible job seekers aged 55 and older, actively contributing to a skilled and inclusive workforce through service-based training. The program's emphasis on Individualized Career Services and paid community service hours addresses barriers faced by older individuals, ensuring opportunities for re-entry into the labor market. SCSEP meticulously identifies occupations suitable for older workers, aligning with the state's goal to tailor workforce programs to high-demand occupations. Collaborating with the WIOA system and forming partnerships with CareerForce and Area Agencies on Aging, SCSEP aligns seamlessly with the state's emphasis on coordination and collaboration. Recognizing the significance of overcoming obstacles, SCSEP focuses on addressing skill challenges, fostering inclusivity in partnership with community-based organizations, faith-based groups, and programs for people with disabilities. The program will continue to play an important role in Minnesota's workforce development, intricately woven into the state's overarching vision for a robust, healthy, and inclusive workforce.

2) Promising practices from the previous 4-year plan that your program will be expanding on, including the data or empirical evidence used to inform this decision

Minnesota's SCSEP will continue to target high-demand occupations, delivering tailored training and individualized plans for participants. Ongoing partnerships with WIOA programs, CareerForce, Area Agency on Aging, and community-based organizations guarantee comprehensive support. The program will utilize Labor Market Information to focus on minority recruitment, retention efforts, and technical assistance. Adapting interventions based on local unemployment rates, the program will sustain supportive services for enhanced employment outcomes. Continuous improvement remains a priority, with benchmarks and active performance monitoring as long-term strategies. Employer engagement, exemplified by job fairs and clubs, continues to generate job opportunities. The program remains committed to addressing the unique needs of the older population through sustained outreach campaigns. Emphasizing equitable distribution in rural and urban areas, customized outreach ensures fair access to services for all Minnesotans.

3) What areas described in your last state plan contribution you will not continue to pursue, including the data or empirical evidence used to inform this decision

SCSEP will continue to pursue all areas described in the previous state plan.

Youth

- WIOA Youth Program: Minnesota's WIOA Youth Program provides comprehensive employment and training services to opportunity youth, including work-based learning, an introduction to career pathways, attainment of recognized credentials and wrap-around support services. Participants are youth ages 16 - 24 who are not attending any school, and in-school youth ages 14-21 who are low-income and at-risk. Minnesota serves a high percentage of youth who are most in need of services such as homeless youth and runaways, youth in foster care, youth with disabilities and youth from families on public assistance. Minnesota is serving youth who are under-represented in the workforce. For example, Native American youth are served at a level that is 3 times the national average. Minnesota supports partnerships with other State and federally funded youth programs to increase the quality of services available to participants.

WIOA Youth Programs provide youth with access to postsecondary training and credentials which reflect 21st century skill requirements. Examples of co-enrollment opportunities for WIOA Youth participants include: the Minnesota Family Investment Program (MFIP), Vocational Rehabilitation Services (VRS/Pre-ETS),⁷ Adult WIOA, Adult Basic Education (ABE), Minnesota Youth Program (MYP), Youthbuild, Job Corps and Youth at Work Equity Grants. For more information, see the WIOA Youth Program webpage: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp>.

- **Minnesota Youth Program (MYP):** MYP serves low-income youth, ages 14 to 24, and is the only youth employment program available in all 87 counties. Over half of the youth served under MYP receive academic credit or service-learning credit for work-based learning. Other MYP services include: career exploration and counseling, labor market information on in-demand occupations, work readiness skills, financial literacy training, work experience and support services. MYP serves nearly 3,766 youth each year through individual, case managed services and almost 30,000 youth through the Outreach to Schools component. MYP operates in coordination with WIOA, under oversight of Local Workforce Development Boards appointed by Local Elected Officials (business-led majority). Each \$1 of MYP funds leverages over \$6 of other federal, state and local resources. Youth may be co-enrolled in WIOA, MFIP, VRS, or Youthbuild as a result of strong local partnerships. Worksite supervisors/employers evaluate the contextual work readiness skills of youth on the MYP worksite using pre and post assessments. For more information, see the Minnesota Youth Program webpage: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/youth-program.jsp>.
- **Minnesota Youthbuild Program:** The state-funded Youthbuild Program offers construction and other high-wage in-demand career pathways for low-income, at-risk youth, ages 16-24, who have dropped out of school or are at-risk of dropping out. Youthbuild provides targeted youth pre-apprenticeship training, industry-recognized credentials, contextual basic skills and work readiness soft skills; career exploration and counseling; mentoring and leadership development; and support services. In SFY 2024, 14 community-based organizations provide services across Minnesota. In SFY 2023, Youthbuild served 453 youth in ten locations in Minnesota. Each \$1 of state Youthbuild funding is matched by one local dollar. State funds are used as match for federal YouthBuild resources. Currently, Minnesota Youthbuild programs leverage \$5 million in federal YouthBuild dollars. Minnesota Youthbuild programs also coordinate with local HUD offices, where available in their communities, to assist interested low-income Youthbuild participants to apply as a Section 3 workers, making these young people eligible for HUD-funded construction employment, training, and contracting opportunities. Previous St. Paul Youthbuild participants have been hired as Section 3 workers after training in the Minnesota Youthbuild program and applying to become a Section 3 worker. For more information, see the Youthbuild webpage at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/youthbuild.jsp>
- **Youth at Work Competitive Grants:** provide workforce development and training opportunities for economically disadvantaged and at-risk youth with special consideration for youth from BIPOC communities and youth with disabilities. 77% of the youth served are from BIPOC communities in State Fiscal Year 2023. Experiential learning opportunities are designed for youth that promote mastery of work readiness

competencies and 21st Century skills. Projects promote skill acquisition (academic and work readiness) through project-based instruction and increase exposure to in-demand jobs important to regional economies. In response to the COVID-19 precautions, many programs converted programming from in-person to virtual. This meant many youth needed access to internet hot spots, laptops, and other technology in order to complete required schooling and remote work. Providing these resources to youth ensure low-income youth and BIPOC youth had equitable access to online learning and working. The program served 10,020 youth in SFY23. Youth at Work Competitive grants provide high-quality worksites and overall participant and employer satisfaction. These are two-year grants that emphasize innovation in serving youth. For more information, see the Youth Equity Grants webpage: <https://mn.gov/deed/programs-services/office-youth-development/special/grants/>.

- Youth Support Services Grants: The Minnesota Legislature appropriated \$475,000 in State Fiscal Year (SFY) 2023 for a competitive grant program to provide support services for individuals. Grant funded services include job training, employment preparation, internships, job assistance to parents, financial literacy, academic and behavioral interventions for low-performing students, and youth intervention activities. Grants must serve individuals from low-income communities, and/or young adults from families with a history of intergenerational poverty, and/or BIPOC communities. In SFY 23 were 17 Youth Support Services grantees with 54% of the grant funds allocated to the Twin Cities metro area and 46% allocated to Greater Minnesota. Through these grants, 425 young people received individual services in SFY 23 with over 94% receiving education, employment preparation, or work readiness services. The young people served through these grants were 83% from BIPOC communities, 14% identifying as having a disability, and 47% young women. Detailed program information and reports available at <https://mn.gov/deed/programs-services/office-youth-development/special/youth-support/>
- Disability Employment Initiative (DEI): Partners for Youth Career Pathways - Minnesota is managing a \$2.5 million, 42-month DEI grant funded through the U.S. DOL's Employment and Training Administration and the Office of Disability Employment Policy. This grant allowed three of Minnesota's rural WDAs to strengthen partnerships and strategically align career pathways systems to effectively serve youth with disabilities through multiple entry and exit points. The federal DEI grant allowed Minnesota to expand the number of Employment Networks (ENs) in the state which increases services to Social Security disability beneficiaries. The DEI helped Minnesota build the capacity of rural WDA staff to increase the number of youth with disabilities participating in career pathways programs by implementing the Integrated Resource Team (IRT) approach and the Guideposts for Success best practices framework into service delivery. The DEI grant was successfully closed out in the spring of 2020. For more information on the DEI see the Disability Employment Initiative weblink: <https://mn.gov/deed/programs-services/office-youth-development/special/disability-employment-initiative/>.
- DEED, DHS, and MAWB have worked in partnership since 2009 to serve teen parents receiving Minnesota Family Investment Program (MFIP) benefits or in TANF-eligible households. This partnership has leveraged over \$8.6 million of TANF funds to provide work experience and work-readiness training for over 5,000 teen parents who were receiving MFIP benefits or younger youth who were MFIP recipients. The partnership addresses disparities in MFIP outcomes, especially the Work Participation Rate, for

African American and American Indian participants. Many of the participants have little or no previous work experience and they develop work readiness skills through their participation in the project. Participants are assigned a youth counselor/case manager and receive labor market information highlighting in-demand industries and educational opportunities available in the region. Co-enrollment in the WIOA Youth Program and the Minnesota Youth Program, when appropriate, has contributed to the success of these projects.

Some of the in-demand industries and occupations that are introduced to youth include information technology, manufacturing, transportation, childcare, and health care. Youth are informed of the in-demand occupations that are readily available in the area in which they live as well as the in-demand occupations in Minnesota more broadly. Person-centered planning is a major key to success. The work experiences that youth receive are targeted to their specific career interest areas as much as possible to provide hands-on exposure to a field that is intriguing to them. Career readiness skills are assessed on the worksite by the worksite supervisors, allowing the youth to gauge their skill level with regards to industry-specific expectations and requirements. Local WDAs leverage existing partnerships with Adult Basic Education (ABE) to help ensure youth have the foundational skills to persist through programming. Some WDAs have ABE co-located and this is identified as a best practice so as to reduce barriers for youth participation and persistence through workforce and education programming. Financial literacy tools are used to help each youth navigate having a job and managing the earnings that follows. During the COVID-19 pandemic, providers instituted virtual opportunities for participants to complete work readiness training and earn a stipend for their work. Some virtual work experiences have also been developed to meet the needs of participants and employers during the pandemic and beyond.

The TANF project has enabled young adults, many of whom have significant barriers to obtaining and maintaining employment, to explore educational opportunities and fulfilling careers that will set them and their families up for lifelong success. A 2018 evaluation report and other TANF Youth Innovation resources and participant success stories can be found on the project webpage: <https://mn.gov/deed/programs-services/office-youth-development/special/tanf/>.

The Minnesota Youth Program (MYP) provides short-term, contextualized and individualized training services for at-risk youth, ages 14 to 24. Coordinated at the local level by the Workforce Development Boards/Youth Committees, MYP eligibility criteria is more flexible (inclusive) than the WIOA Youth Program. MYP serves an extremely disadvantaged group of young men and women: participants have multiple challenges such as substance abuse, criminal records, mental health issues, and cognitive learning limitations, in addition to being poor. The COVID-19 Pandemic caused disruption to established in-person service models. Services to youth that were previously provided in-person shifted to virtual models. Various state and funding sources were leveraged to increase educational access in spite of the pandemic health protocols.

Robotics Teams and STEM Internships Competitive Grant Program

Minnesota's legislature appropriated \$3,000,000 to DEED that would create a competitive grant program focused on supporting high school robotics teams as well as dedicated funds to support youth internships with private sector, STEM-focused employers. The funds were awarded to nine organizations including colleges, school districts, non-profits, and a local workforce development area. The Robotics Teams and STEM Internships Grant program aligns

well with federal efforts of the Investing in America Act (IIA) by supporting youth workforce development in high-demand occupations and industries in Minnesota.

Title II

Minnesota's Adult Education (ABE) system will help:

- Increase collaboration and alignment;
- Build employer-led industry sector partnerships; and
- Create a more inclusive workforce system.

Increase Collaboration and Alignment

- Minnesota Adult Education works collaboratively with learner and community goals through: co-locations, Regional Transitions Coordinators, Ability-to-Benefit, and Conditional Work Referrals.
- Adult education instruction and services are frequently co-located with postsecondary, CareerForce, social service organizations, corrections, Tribal Nation entities, online, and additional areas in order to better reach learners and connect them with partner services. This co-location also helps increase communication and collaboration with workforce development partners.
- Minnesota Adult Education has also set up a regional system of collaboration with partners through the Regional Transitions Coordinators (RTCs). RTCs help connect ABE providers with workforce development partner systems and share best practices in effective partnering with the help of the Minnesota Association of Workforce Boards (MAWB).
- Collaborations with Minnesota State (public postsecondary system) have led to a state Ability-to-Benefit plan and options that gives adults access to financial aid for postsecondary career-focused programs while still completing their diploma with ABE.
- Collaborations with DEED and CareerForce have created a Conditional Work Referral process to help build adults' technology and employability skills through a referral from the one-stop center. The technology and employability skill instruction is funded using state ABE funding that is not matched with federal adult education funding.

Build employer-led industry sector partnerships

Minnesota Adult Education providers work with hundreds of employer worksites through: workplace education programs, Integrated Education and Training, contextualized instruction, and teaching essential technology and employability skills.

- Minnesota Adult Education will encourage adult education providers to identify employers in priority sectors and industries to explore and develop workplace education programs with employers to build employees' skills. Adult education providers can utilize regional transitions funding and/or other federal and state adult education funding to help develop and sustain workplace education programs.
- Adult Education providers are encouraged to develop Integrated Education and Training (IET) programs with employers and training institutions to help individuals further their career pathways. IET programs are required to combine the education, employability skills, and workforce training in a single program to shorten the timeline

for adults to be skilled and ready for employment. Minnesota Adult Education provides special IET professional development and technical assistance to make the IET development process easier. Cohort professional development and ongoing coaching with professional development providers and the Minnesota Department of Education have been effective in helping providers implement IETs effectively.

- Education efforts for adults are frequently contextualized. Minnesota Adult Education providers create contextualized English, math and other basic skills instruction for learners that are often focused on their career pathway goals to help build their skills and apply them in work and life. In addition, the contextualized instruction can work in multiple ways in different programs, from career exploration to credential completion programs.
- Employers and adult learners frequently note how technology and employability skills are essential for any employee to be successful. Minnesota Adult Education has prioritized these skills by setting content standards in digital literacy skills and employability skills in addition to the academic skills. Adult Education providers are expected to integrate technology and employability skills into academic instruction. Adult Education staff have access to professional development and resources to help them embed technology and employability content and skills in their instruction.

Create a more inclusive workforce system

The Adult Education Team at the Minnesota Department of Education is committed to improving diversity, equity, and inclusion efforts to make education and workforce systems accessible and inclusive for all learners.

- More than half of Minnesota Adult Education learners have English language acquisition goals. Many of these learners are newly arrived immigrants and refugees. Minnesota Adult Education providers offer differentiated and comprehensive English language instruction to meet this need.
- Adult Education providers understand that if a learner does not have their basic needs covered, the learner's ability to further their education will be limited. Providers build trust with learners so they can identify needs and help connect learners with support services to meet their basic needs, including but not limited to food, housing, transportation, clothing, and childcare. Many Adult Education providers also partner with entities to provide some of these services, like children's education activities offered during adult education classes.
- In 2021, Minnesota Adult Education created a grant to identify and analyze equity issues in adult education. Part of this work included the development of advisory groups of staff and learners to drive this work. As this work evolves, Minnesota Adult Education will: focus on developing and implementing provider- and state-level tools to deeply analyze policies and practices; create a community of practice to further the work and advise the State Adult Education team and system; and provide professional development to help build individual and team awareness of equity issues and efforts.
- Ensuring our communications, programming, and resources are accessible to Minnesotans is also important. The Adult Education Team at MDE reviews communications and resources developed and work to make them accessible. All adult education programs are required to make reasonable and appropriate accommodations. Minnesota Adult Education has a support network provider that helps providers work

with students with disabilities and has resources online (www.pandamn.org). In addition, Minnesota Adult Education has created some specialized programs for adults who are Deaf, programs for adults who are blind or have impaired vision, and programs for adults who have had a traumatic brain injury.

Additional Strategies

Regularly communicating and sharing information are key to building relationships that help us collaborate more deeply, build adult career pathways, and create a better, more inclusive workforce system. The Adult Education (ABE) team at the Minnesota Department of Education regularly participates in Governor's Workforce Development Board meetings, communicating our work with the board, workforce development programs, and community partners. Local ABE partners will contribute to infrastructure funding of the local one-stop system.

Title III

The Employment Service Program oversees the operation of several statewide programs under the identity of Job Service. This includes Work Opportunity Tax Credits, Bonding, Foreign Labor Certification, Agricultural Outreach to Migrant and Seasonal Farm Workers, Partners for Reentry Opportunities in Workforce Development (PROWD), and several other local and statewide programs and services. The Job Service team works closely with the Veterans Employment Service team, that operates the Jobs for Veterans State Grant (JVSG) program.

These teams will continue to work with DEED leadership to implement the vision, goals and strategies through: participation in Objectives and Key Result activities; adhering to DEED's values; participation in the Job Quality Academy activities and planning; and serving as a conduit between the partners of the CareerForce system and the State Workforce Agency.

Title IV

Minnesota's Vocational Rehabilitation program is carrying out a number of activities related to the State's Vision, Goals, and Strategies, including:

Targeted Populations: providing pathways to family sustaining wages to workers who have been overlooked for employment – particularly people of color:

- Dedicated outreach to individuals with disabilities, including students of color, to expand public awareness.
- Providing paid work experience and introduction to careers that provide family-sustaining wages.
- Focusing on hiring staff who are representative of the people we serve.
- Researching other state's rebranding strategies to reach more people.

Office of New Americans (ONA): working with ONA to support immigrants and refugees:

- VRS has dedicated New Americans staff, located in the St. Paul office.
- VRS has an outreach and coordination position focused on DEIA, who works directly with the ONA team and coordinates with VRS field services.

- CareerForce employees will be trained on serving immigrants, but the capacity of community-owned non-profits will also be developed with possible funding through Targeted Population grants.

Good Jobs Principles: supporting employer clients in adopting Good Jobs Principles to provide high-quality employment opportunities and improve retention by:

- VRS, along with some business representatives from Mayo Health System, developed “Bite-size Learning” modules, which are a resource for employers that takes a topic around employing individuals with disabilities and breaks it into short modules that can be presented in about 20 minutes. There are 5 current modules on DEED’s CareerForce website on the following topics:
 - Defining Disability and the Americans with Disabilities Act
 - Recognizing and Implementing a Request for Reasonable Accommodations
 - Self ID: Building a More Inclusive Culture
 - Inclusive Communication
 - Mental Health Matters: Let’s Talk
- VRS leads and convenes Business Engagement Networks (BEN’s) focused on meeting the needs of business by providing a talent pool of candidates that can meet the needs of business utilizing a Single Point of Contact (SPOC) coordinated approach with VRS, Community Rehabilitation Providers, and Special Education Work Coordinators.
- The Employer Reasonable Accommodation Fund (ERAF) is a pilot program that creates a central fund for the next two years where small- to mid-sized Minnesota employers can request reimbursement for expenses related to providing reasonable accommodations for job applicants and employees with disabilities. The ERAF’s purpose is to encourage employment of people with disabilities by reducing any perceived or real financial barriers.
- Inclusive Worksite Training & Certification Program, which DEED is leading, is coming in 2024.

Individualized Career Services: utilize individualized career services through person-centered practices. Every participant served by VRS receives individualized career services provided by an array of vocational rehabilitation professionals.

Attracting and retaining workers: implementing strategies to support employers in improving job quality and marketing of job opportunities to support attraction and retention strategies, including:

- VRS leads and convenes Business Engagement Networks (BEN’s) focused on meeting the needs of business by providing a talent pool of candidates that can meet the needs of business utilizing a Single Point of Contact (SPOC) coordinated approach with VRS, Community Rehabilitation Providers, and Special Education Work Coordinators.
- Employer Reasonable Accommodation Fund (ERAF)
- Inclusive Worksite Training & Certification Program, which DEED is leading, is coming in 2024.

Supportive Services: providing wraparound or supportive services to ensure access to the resources needed to enroll or complete workforce development programs and are retained in employment:

- VRS collaborates with workforce development partners, MDE, DHS, county and local service providers to offer statewide employment services.
- E1MN Framework
- Youth Services Strategic Plan
- Minnesota VRS has been a leader in implementing the Evidence Based Practice of Supported Employment for persons with serious and persistent mental illness known as Individual Placement and Support (IPS). Minnesota's programs utilize the IPS fidelity scale (2008) to guide program development and implementation as well as program evaluation and outcome measurement.

Minnesota State Services for the Blind, a Title IV vocational rehabilitation program, created our specific goals, priorities, and strategies to be in alignment with the overall State Plan vision, goals, and strategies. The only major difference is that our goals are tailored towards our customer base: individuals who are blind, low vision, and DeafBlind.

1. Improve Partnerships. Increase interagency coordination with local and state workforce partners so individuals who are blind, low vision, and DeafBlind and employers have a customer-centric, positive experience no matter which "door" they enter.
2. Increase the Workforce Participation Rate. Build relationships with businesses that lead to career opportunities with family sustaining wages for individuals who are blind, low vision, and DeafBlind. It is recognized that services prior to job placement in the individuals plan may include internships and work opportunities that build a work foundation that leads to meaningful and career path employment.
3. Focus on Diversity, Equity, Inclusion, and Accessibility. Create an agency that better meets the needs of the current and emerging workforce, including improving services to new Americans, underrepresented communities, and veterans.
4. Marketing Work Ready Individuals to Employers. Identify and implement innovative and evidence-based practices and service-delivery approaches so that individuals with disabilities have the same opportunities in the labor market as everyone else.

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.

Services to Laid-Off Adults

Unemployment Insurance — DEED houses the state's Unemployment Insurance (UI) division. CareerForce locations provide co-location for UI staff members to coordinate reemployment initiatives for claimants and the long-term unemployed. The Reemployment Services and Eligibility Assessment (RESEA) engages UI claimants within the first weeks of their benefit

payments to provide earlier engagement and increased services through CareerForce locations to expedite their return to work.

Dislocated Worker Program — This program mitigates the negative impact to businesses, communities, and employees who are facing a layoff. It assists laid-off workers in returning to work with comparable wages and benefits and connects employers with skilled staff.

Participants enrolled in the program can access career planning and counseling; job search and placement services; short-term training upon counselor approval; and support services for expenses such as childcare and transportation upon counselor approval. Minnesota maintains both a federally and state-funded Dislocated Worker program.

State Rapid Response Team — The State Rapid Response Team (SRRT) is the first responder when a business has closed down or is planning to lay off workers. The ~~team~~ SRRT is trained to assess the situation and inform the affected workers of available services, including the Dislocated Worker Program. In 2025, the State Rapid Response Team (SRRT) was moved into the DEED CareerForce Division in order to better coordinate work with employers who were laying off workers or considering layoffs with staff who work with job seekers and employers throughout Minnesota. Participants enrolled in the program can access career planning and counseling; job search and placement services; short-term training upon counselor approval; and support services for expenses such as childcare and transportation upon counselor approval. Minnesota maintains both a federally and state-funded Dislocated Worker program.

Trade Adjustment Assistance (TAA) — Starting in August 2020, the United States Congress did not reauthorize the Trade Act, which resulted in its current sunset stage. Minnesota continued to provide services to participants covered under a TAA petition filed and certified on or before June 30, 2022 and who enrolled by September 30, 2025. As of October 1, 2025, Minnesota is no longer accepting new TAA applications.

~~This program provides aid to workers who lose their jobs, or are at risk of losing their jobs, or whose hours of work and wages are reduced as a result of foreign competition. TAA assists laidoff workers in returning to the workforce as quickly as possible by offering them help with work searches, relocation, job training, and weekly cash benefits. There are two major components, separately funded by the U.S. Department of Labor: Trade Readjustment Allowances (TRA), which are special extensions to unemployment insurance; and Trade Adjustment Assistance (TAA) which includes assistance with training costs, job search allowances, relocation allowances, and similar costs. TAA now uses Electronic Document Storage within the case management database which reduces cost and waste and increases efficiency.~~

Assessments for Job Seekers — Local areas use a variety of assessment instruments across the state, but the most commonly used are the DOL Career One Stop's Interest, Skills and Work Value assessments. Interest and skills assessments are also accessible on CareerForce.MN.gov ~~have been made available on the CareerForceMN.com platform to assist job seekers.~~ Minnesota also developed an "Employment Readiness Profile" assessment that is used across the state on CareerForce.MN.gov. This assessment functions as a triage tool and was developed by Title I and Title III staff. CareerForce.MN.gov also features a ~~In 2021, CareerForceMN.com also released a~~ "Compare Skills" tool that demonstrates how skills of one job transfer to other jobs, and ~~also~~ filters those results to direct seekers to current jobs in demand ~~today~~.

Services to Adults with Barriers to Employment

WIOA Adult – The program serves adults who are seeking greater participation in the labor force and prioritizes individuals who receive public assistance, individuals living with low incomes, and veterans. Minnesota is developing additional policy that leverage state resources to address disparities gaps in race, disability, and disconnected youth which is a priority of this plan. Services include a preliminary assessment of skill levels, support services, occupational or on-the-job training or work-based learning, job search and placement assistance, access to apprenticeship opportunities, and career counseling. It also provides resource libraries providing access to employment-related services such as current job vacancies via local education and training service providers, and labor market information. WIOA Adult providers have been partnering with Adult Career Pathway programming to ensure individuals have access to career pathways that lead to family sustaining wages or beyond.

Minnesota Pathways to Prosperity – Minnesota Pathways to Prosperity (P2P) is an innovative framework built on a Career Pathway programming model, which integrates basic skills education, competency-based skills training, support services, higher-level education for those who chose, employment placement and retention to meet the needs of adults. P2P projects are designed for adults who traditionally face multiple barriers to employment, and who need enhanced educational and supportive services to be successful in securing long-term family sustaining wages. P2P provides opportunities to build their skills through On-Ramp, Bridge, and Individualized Training career pathways models that ultimately lead to employment in an industry sector at a family sustaining wage. This competitively awarded grant program targets populations of color; individuals experiencing housing insecurity; individuals with a criminal record; those lacking a high school diploma or equivalent; individuals with disabilities; and those unemployed for 26 or more consecutive weeks. In addition, special consideration should be provided to veterans, those returning to work after receiving public assistance, low-income, and older workers. Participating individuals obtain, retain, and advance in unsubsidized employment or complete training along an educational path, as demonstrated by annual wage increases, placement and retention in a job or education or training program, and completion of training leading to an industry-recognized credential. P2P is a competitive grant program that is fully funded by the state.

MN Family Resiliency Partnership Program – (formerly displaced homemakers) – This program provides pre-employment services that empower participants to enter or re-enter the labor market. Customers are women and men who have worked in the home for a substantial number of years caring for home and family but, due to separation, divorce, death, or disability of spouse or partner, or other loss of financial support, must now support themselves and their families. These participants often need to address and resolve multiple barriers before they can be competitive in the workforce. Most participants are worried about basic needs for themselves and their families, such as stable housing, caring for a spouse or child with a disability or escaping a violent relationship or situation. Eligibility for this program is based on income guidelines. The six providers offer services covering 51 counties in the State. MN Family Resiliency Partnership is a state-funded program.

Minnesota Family Investment Program (MFIP/TANF) — This program helps families with children meet their basic needs, while helping parents move to financial stability through work. Parents are expected to work and are supported in working with both cash and food assistance. Most families have a lifetime limit of 60 months on MFIP. DEED works with the DHS Economic Assistance and Employment Supports Division to ensure the program goals of MFIP are met.

SNAP Employment and Training Program (E&T) — The Minnesota Department of [Human Children, Youth and Families Services](#) (MN DCYF) administers the state's SNAP

Employment and Training Program (SNAP E&T) by supervising local counties and directly contracting with community agencies. Minnesota's SNAP E&T program is built on strong partnerships and offers multiple contracting options. Interested providers can contract through the DCFHS, Minnesota's Department of Employment and Economic Development (DEED), and certain other Minnesota Counties. DCFHS contracts directly with agencies and organizations seeking to offer a range of jobs-driven employment support programs across the state. This includes organizations already receiving a portion of E&T funding through their local county. DCFHS is the contracting agency for all tribal contracts and other state agencies. DEED's SNAP E&T program is available as an enhancement to existing contracts for non-federal funding through DEED. Also, some counties elect to contract with organizations who provide a range of jobs-driven employment supports to low-income residents of the county.

Senior Community Service Employment Program (SCSEP) — The SCSEP program fosters economic self-sufficiency through community service activities for unemployed, low-income persons who are 55 years of age and older and have poor employment prospects. Program clients are Minnesotans with an income of less than 125 percent of the federal poverty levels, who want or need additional income. Service providers include five Local Workforce Development Areas, three community action agencies, three counties, two national sponsors, and one Native American tribe. Program operations are sub-granted to 11 local agencies that serve workers in 60 counties throughout the state; remaining 27 counties are served by national sponsors.

Women in High-Wage, High Demand Nontraditional Jobs Grant Program — This program seeks to increase the number of women in high-wage, high-demand, nontraditional occupations including those in the skilled trades, science, technology, engineering, and math (STEM) occupations. Grant funds serve women, especially low-income women and women over 50 years of age. This is a state-funded grant program, which began in December 2014 and continues.

Migrant and Seasonal Farm Workers — This program provides migrant seasonal farm workers with a full range of employment services and referrals to other community services. Migrant and other seasonal employees engaged in farm work that are legally eligible to work in the United States and of legal age to perform services for wages are eligible for services. The full range of services provided includes: job search assistance and placement, job counseling, training opportunities, and referrals to supportive services and programs. The program is administered by a Job Service supervisor who leads the State Monitor Advocate and migrant labor representatives. Migrant Labor Representatives are fluent in both English and Spanish, to better serve the predominantly Spanish-speaking clientele.

Southeast Asian Economic Disparities Relief Grant Program — This program was implemented in July of 2016 to address economic disparities in Southeast Asian communities through workforce recruitment and development, job creation, assistance to smaller organizations to increase capacity and outreach services. The Minnesota Legislature has funded this program every year since its inception.

Adult support services — This competitive grant focuses on low-income communities, young adults from families with a history of intergenerational poverty, and communities of color to provide support services to individuals, such as job training, employment preparation, internships, job assistance to fathers, financial literacy, academic and behavioral interventions for low-performing students, and youth intervention. The Minnesota Legislature has funded this program every year since its inception.

Youth

- *WIOA Youth Program* — Minnesota's WIOA Youth Program provides comprehensive employment and training services to opportunity youth, including work-based learning, an introduction to career pathways, attainment of recognized credentials and wrap-around support services. Participants are youth ages 16 - 24 who are not attending any school, and in-school youth ages 14-21 who are low-income and at-risk. Minnesota serves a high percentage of youth who are most in need of services such as homeless youth and runaways, youth in foster care, youth with disabilities and youth from families on public assistance. Minnesota is serving youth who are under-represented in the workforce. For example, Native American youth are served at a level that is 3 times the national average. Minnesota supports partnerships with other State and federally funded youth programs to increase the quality of services available to participants. WIOA Youth Programs provide youth with access to postsecondary training and credentials which reflect 21st century skill requirements. Examples of co-enrollment opportunities for WIOA Youth participants include: the Minnesota Family Investment Program (MFIP), Vocational Rehabilitation Services (VRS/Pre-ETS), Adult WIOA, Adult Basic Education (ABE), Minnesota Youth Program (MYP), Youthbuild, Job Corps and Youth at Work Equity Grants. For more information, see the WIOA Youth Program webpage: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp>.
- *Minnesota Youth Program (MYP)*: MYP serves low-income youth, ages 14 to 24, and is the only youth employment program available in all 87 counties. Over half of the youth served under MYP receive academic credit or service-learning credit for work-based learning. Other MYP services include career exploration and counseling, labor market information on in-demand occupations, work readiness skills, financial literacy training, work experience and support services. MYP serves nearly 3,766 youth each year through individual, case managed services and almost 30,000 youth through the Outreach to Schools component. MYP operates in coordination with WIOA, under oversight of Local Workforce Development Boards appointed by Local Elected Officials (business-led majority). Each \$1 of MYP funds leverages over \$6 of other federal, state and local resources. Youth may be co-enrolled in WIOA, MFIP, VRS, or Youthbuild because of strong local partnerships. Worksite supervisors/employers evaluate the contextual work readiness skills of youth on the MYP worksite using pre and post assessments. For more information, see the Minnesota Youth Program webpage: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/youth-program.jsp>.
- *Youthbuild Program*: The state funded Youthbuild Program offers a construction career pathway for low-income, at-risk youth, ages 16-24, who have dropped out of school or are at-risk of dropping out. Youthbuild provides pre-apprenticeship training, industry-recognized credentials, contextual basic skills and work readiness soft skills; career exploration and counseling; mentoring and leadership development; and support services. Ten organizations provide services across Minnesota. Each \$1 of state Youthbuild funding is matched by one local dollar and state funds are used as match for federal YouthBuild resources. The pandemic impacted services for Minnesota Youthbuild grantees and caused construction projects to be delayed. Local Youthbuild staff pivoted construction training and programming to virtual formats in response to

pandemic restrictions. For more information, see the Youthbuild webpage at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/youthbuild.jsp>.

- *Youth at Work Equity Grants*: provide workforce development and training opportunities for economically disadvantaged and at-risk youth with special consideration for youth from BIPOC communities and youth with disabilities. 86% of the youth served are from BIPOC communities in State Fiscal Year 2023. Experiential learning opportunities are designed for youth that promote mastery of work readiness competencies and 21st Century skills. Projects promote skill acquisition (academic and work readiness) through project-based instruction and increase exposure to in-demand jobs important to regional economies. In response to the COVID-19 precautions, many programs converted programming from in-person to virtual. This meant many youth needed access to internet hot spots, laptops, and other technology to complete required schooling and remote work. Providing these resources to youth ensure low-income youth and BIPOC youth had equitable access to online learning and working. The program served 8215 youth in SFY23. Youth at Work Equity grants provide high-quality worksites and overall participant and employer satisfaction. These are two-year grants that emphasize innovation in serving youth. For more information, see the Youth Equity Grants webpage: <https://mn.gov/deed/programs-services/office-youth-development/special/grants/>.
- *Youth Support Services Grants*: The Minnesota Legislature appropriated \$475,000 in State Fiscal Year (SFY) 2023 for a competitive grant program to provide support services for individuals. Grant funded services include job training, employment preparation, internships, job assistance to parents, financial literacy, academic and behavioral interventions for low-performing students, and youth intervention activities. Grants must serve individuals from low-income communities, and/or young adults from families with a history of intergenerational poverty, and/or BIPOC communities. In SFY 23 were 17 Youth Support Services grantees with 54% of the grant funds allocated to the Twin Cities metro area and 46% allocated to Greater Minnesota. Through these grants, 425 young people received individual services in SFY 23 with over 94% receiving education, employment preparation, or work readiness services. The young people served through these grants were 83% from BIPOC communities, 14% identifying as having a disability, and 47% young women. Detailed program information and reports available at <https://mn.gov/deed/programs-services/office-youth-development/special/youth-support/>
- *Disability Employment Initiative (DEI)*: Partners for Youth Career Pathways - Minnesota is managing a \$2.5 million, 42-month DEI grant funded through the U.S. DOL's Employment and Training Administration and the Office of Disability Employment Policy. This grant allowed three of Minnesota's rural WDAs to strengthen partnerships and strategically align career pathways systems to effectively serve youth with disabilities through multiple entry and exit points. The federal DEI grant allowed Minnesota to expand the number of Employment Networks (ENs) in the state which increases services to Social Security disability beneficiaries. The DEI helped Minnesota build the capacity of rural WDA staff to increase the number of youths with disabilities participating in career pathways programs by implementing the Integrated Resource Team (IRT) approach and the Guideposts for Success best practices framework into service delivery. The DEI grant was successfully closed out in the spring of 2020. For more information on the DEI see the Disability Employment Initiative

weblink: <https://mn.gov/deed/programs-services/office-youth-development/special/disability-employment-initiative/>.

- *DEED, DHS, and MAWB have worked in partnership:* Since 2009 to serve teen parents receiving Minnesota Family Investment Program (MFIP) benefits or in TANF-eligible households. This partnership has leveraged over \$8.6 million in TANF funds to provide work experience and work-readiness training for over 5,000 teen parents who were receiving MFIP benefits or younger youth who were MFIP recipients. The partnership addresses disparities in MFIP outcomes, especially the Work Participation Rate, for African American and American Indian participants. Many of the participants have little or no previous work experience and they develop work readiness skills through their participation in the project. Participants are assigned a youth counselor/case manager and receive labor market information highlighting in-demand industries and educational opportunities available in the region. Co-enrollment in the WIOA Youth Program and the Minnesota Youth Program, when appropriate, has contributed to the success of these projects.
- The TANF project: has enabled young adults, many of whom have significant barriers to obtaining and maintaining employment, to explore educational opportunities and fulfilling careers that will set them and their families up for lifelong success. A 2018 evaluation report and other TANF Youth Innovation resources and participant success stories can be found on the project webpage: <https://mn.gov/deed/programs-services/office-youth-development/special/tanf/>.

The Minnesota Youth Program (MYP) provides short-term, contextualized and individualized training services for at-risk youth, ages 14 to 24. Coordinated at the local level by the Workforce Development Boards/Youth Committees, MYP eligibility criteria is more flexible (inclusive) than the WIOA Youth Program. MYP serves an extremely disadvantaged group of young men and women: participants have multiple challenges such as substance abuse, criminal records, mental health issues, and cognitive learning limitations, in addition to being poor. The COVID-19 Pandemic caused disruption to established in-person service models. Services to youth that were previously provided in-person shifted to virtual models. Various state and funding sources were leveraged to increase educational access in spite of the pandemic health protocols.

Robotics Teams and STEM Internships Competitive Grant Program

Minnesota's legislature appropriated \$3,000,000 to DEED that would create a competitive grant program focused on supporting high school robotics teams as well as dedicated funds to support youth internships with private sector, STEM-focused employers. The funds were awarded to nine organizations including colleges, school districts, non-profits, and a local workforce development area. The Robotics Teams and STEM Internships Grant program aligns well with federal efforts of the Investing in America Act (IIA) by supporting youth workforce development in high-demand occupations and industries in Minnesota.

Veterans

The Veteran Employment Services is funded by the Jobs for Veterans State Grant (JVSG) from the DOL Veterans Employment and Training Service (VETS). The Jobs for Veterans State Grants

(JVSG) program is a staffing grant that provides federal funding, through a formula grant, to 54 State Workforce Agencies (SWAs) to hire dedicated staff to provide individualized career- and training-related services to eligible veterans and eligible persons with ~~significant~~ barriers to employment ~~(SDE)~~.

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Disabled Veteran Outreach Program (DVOP) representatives are branded as Veterans Employment Specialists. ~~They're, are~~ veterans ~~too~~ themselves, they are well-versed in workforce development programs and community resources, and they relate very well to the job-seeking veterans. They provide intensive and individualized career services to eligible veterans and other eligible persons which include job-readiness assessment, job search strategy, and placement assistance.

Local Veteran Employment Representatives (LVER), focus on assisting and supporting employers in recruiting, hiring, and retaining veterans. LVERs are veterans too and have immediate access to highly qualified veterans seeking employment. Their goal is to create partnerships between public and private organizations that help veterans successfully transition into civilian employment in Minnesota. LVERs plan and participate in job fairs, reach out to businesses to develop job opportunities for veterans, and educate Minnesota businesses on the value veterans bring to a business. LVERs promote credentialing and licensing programs to veterans. Also, they educate and guide CareerForce staff and partners on veterans Priority of Service and veteran's programs and benefits.

Minnesota implemented several system-wide strategies to ensure veterans are receiving Priority of Service (POS) to access workforce services. These strategies include educating CareerForce staff, screening for veteran status at all points of entry, offering special programs for veterans, priority ranking for job vacancies, and access to workshops, annual Veterans Career/Job Fairs, and Veteran Services to employers.

Priority Ranking for Job Vacancies: Minnesota's job bank provides priority of service to all veterans. All new registrants in Minnesota's job bank who check "veteran status" are prompted to answer a series of questions regarding their military engagement. If identified as an eligible veteran, their name goes to the top of the qualified applicant list, and a flag is displayed by their name to designate their veteran status. When employers list job vacancies, they ~~could~~ can identify themselves as a "Veteran-Friendly Employer." Private employers are also encouraged to add the verbiage "Veterans Encouraged to Apply" to job postings, per Minnesota State Statute 197.455.

Priority Access to Workshops: Veterans interested in attending career workshops can register for a variety of classes directly from www.careerforcemn.com. Veterans are never turned away from workshop programming.

Veteran Services to Employers: LVERs plan and coordinate outreach to employers interested in recruiting, hiring, and retaining veterans. Many of these employers were proclaimed as Beyond the Yellow Ribbon companies and they are committed to supporting the military-connected individuals and their families. JVSG has implemented Salesforce customer relationship management (CRM) that is used by LVERs and other partners to track contacts with employers and the services provided to them. The CRM system is critical to enhance our customer and business relationships.

LVERs distribute brochures entitled "Minnesota Veterans...Good for Business" to all employers they meet. LVER and partner staff encourage employers to follow a three-step process to recruit and hire veterans:

1. Post your job opening on www.MinnesotaWorks.net
2. Contact a Veterans Employment Representative
<https://www.careerforcemn.com/gov/Veterans>
3. Connect with your local yellow ribbon network <https://mnbyr.ng.mil/Pages/Yellow-Ribbon-Networks.aspx>.

Veteran Services Outreach / Services to Special Populations / Initiatives

Chapter 31 Disabled Veterans

The state will establish a local Memorandum of Understanding with the U.S. Department of Labor - Veterans' Employment and Training Service (DOL/VETS) and the Veterans Affairs (VA) Veteran Readiness and Employment (VR&E) program. This agreement will clearly define the roles and responsibilities of staff across the partner agencies.

The state is committed to delivering vital workforce information to veterans entering the VR&E program and providing priority job search assistance to those completing it. Furthermore, all partner agencies will engage in a quarterly review of VR&E customers to ensure they are making significant progress toward their career goals.

During the pandemic, the state established an electronic mailbox in order for VR&E staff to send encrypted messages and referrals to maintain confidentiality and protect sensitive data.

- ~~IVSG staff Supervisor and VR&E Manager maintained constant communication to address any issues or questions about the Ch-31 veterans case management process. Chapter 31 Disabled Veterans – The DEED Veterans Intensive Service Coordinator (ISC) is collocating with The Veterans Affairs (VA) Veteran Readiness and Employment (VR&E) Regional office in Fort Snelling. The ISC is responsible for the coordination of initial communication between the Veteran, the VR&E counselor, and the DVOP. DVOPs typically receive notification of an upcoming Chapter 31 disabled Veteran client within 90 days of graduation or upon designation as "job ready" by the VR&E office. When the DVOPs receive the referral from the ISC, they complete a comprehensive assessment and an Individual Employment Plan in collaboration with the referred veterans.~~
- *Homeless Veterans:* DEED and MDVA established the Homeless Veteran Registry Cooperation Agreement in 2016 which allows JVSG staff to access a SharePoint database of registered homeless veterans. Through active participation in the Homeless Veteran Registry, and ongoing partnership in Continuum of Care planning efforts, JVSG is visible and available for Veterans experiencing homelessness throughout Minnesota. JVSG partners with MACV staff which serve on Continuum of Care committees and play crucial roles in informing policy and direction, particularly related to Veteran homelessness. ~~Also, per VPL 05-24 JVSG and HVRP partner closely to facilitate dual-enrolling clients to leverage CareerForce resources, MACV's expertise, and services for Veterans experiencing homelessness. Also, per VPL 3-16, JVSG and MACV partner closely to implement dual enrolling clients to leverage CareerForce resources, MACV's expertise, and services for Veterans experiencing homelessness.~~
- ~~*Native American Veterans:* Veterans Employment Services serves the Native American Veteran population through the DVOP position in the Bemidji area which includes the Red Lake, Leech Lake, and White Earth Tribal Nations in the northern part of the state. The Bemidji DVOP is collocating with the Tribal Veterans Service Officers (TVSO) at White Earth every Tuesday.~~

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- Women Veterans: Women Veterans represent approximately 17 percent of returning National Guard and Reserve troops in Minnesota. Minnesota Department of Veterans Affairs estimates there are almost 23,000 female Veterans in Minnesota. Of that number, about 9700 have served in the Persian Gulf, or OIF/OEF. Minnesota has Veteran staff that is active in different Women's Veterans groups and serves as a liaison with the local DAV chapter. Minnesota currently employs 7 Women Veterans Representatives.
- Justice-Involved Veterans: DEED and the Minnesota Department of Corrections have extended the interagency agreement until June 2026 to continue providing intensive employment services and counseling for justice-involved veterans nearing their release date. JVSG staff is assigned as the Justice-Involved Veterans Project Lead and currently attends the steering committee meetings of the Veterans Diversionary Court Program. The court exists to provide an option for veterans who have had encounters with the criminal court system and provide an alternative to prison. Veterans Treatment Courts are modeled after drug courts, which promote collaboration among the judiciary, community corrections agencies, drug treatment providers, and other community support groups.
- Demobilizing and Transitioning Service Members - Minnesota's "Beyond the Yellow Ribbon" Reintegration Campaign is the backbone of post-deployment reintegration services. MN JVSG staff has been a critical part of this process, which includes five different events for Service members and their families.
- The process begins 3-4 months before deployment. "Family Readiness Academies" are designed to allow families to ask questions and provide information to Troops and their families on what to expect during the deployment. DVOP staff provide resource information and referrals for common issues faced by families. Approximately 30 to 60 days before Troops return home, a "Yellow Ribbon Community Event" is sponsored to help families understand and support their returning Soldiers.
- Business owners, educators, civic leaders, and law enforcement are called together for a briefing on what they can expect upon their Soldiers' return. JVSG staff provide information on AIC services and community resources. Twenty-six Minnesota service providers send staff and materials to various locations as Troops return from overseas deployment for an Initial Reintegration Event.

The Beyond the Yellow Ribbon Program - On May 4th, 2022, Governor Tim Walz of Minnesota proclaimed the Minnesota Department of Employment and Economic Development a Beyond the Yellow Ribbon (BTYR) Organization. BTYR Company Program pays tribute to those organizations with an exceptional record of support, commitment, and compassion for servicemembers, veterans, and their families through various programs, policies, and public works. Demobilizing Veterans and Recently Separated Veterans: Minnesota's "Beyond the Yellow Ribbon" Reintegration Campaign is the backbone of post-deployment reintegration services. Minnesota DVOP/LVER staff have been a critical part of this process which includes five different events for Service members and their families.

- The process begins 3-4 months before deployment. "Family Readiness Academies" are designed to allow families to ask questions and provide information to Troops and their families on what to expect during the deployment. DVOP staff provide resource information and referrals for common

issues faced by families. Approximately 30 to 60 days before Troops return home, a "Yellow Ribbon Community Event" is sponsored to help families understand and support their returning Soldiers.

- Business owners, educators, civic leaders, and law enforcement are called together for a briefing on what they can expect upon their Soldiers' return. LVER and DVOP staff provide resource information, and answers to some difficult questions relating to their combat experience, and how that may affect their lives. Twenty-six Minnesota service providers send staff and materials to various locations as Troops return from overseas deployment for an Initial Reintegration Event. DVOP staff conduct group presentations and work one-on-one to provide information on workforce services available.

Adult Learners

Minnesota's Department of Labor and Industry (DLI): is Minnesota's agency responsible for expanding registered apprenticeships in Minnesota. In addition to registered apprenticeship, DLI administers two other employment-based training programs: Minnesota Dual-Training Pipeline and Youth Skills Training. DEED collaborates with the Department of Labor and Industry to align workforce needs along with other statewide workforce partners. DLI is the lead state agency in developing apprenticeships in traditional and emerging industry sectors in partnership with the core partners in this plan. In addition, DLI is also the lead agency in identifying and establishing opportunities that may lead to registered apprenticeships.

- *Registered apprenticeship programs:* support Minnesota's economy by fostering and promoting employment-based career development through structured training, development and credentialing of highly skilled employees. Minnesota's registered apprenticeship system was launched in 1939, and since then has trained over 110,000 apprentices. Currently, the Department of Labor and Industry supports over 200 registered apprenticeship in several industries, including construction, utilities, transportation, agriculture, healthcare and education. These programs prepare Minnesota's 11,000 apprentices to compete in a global economy through a time-tested employee training system that combines job related technical instruction with related on-the-job learning.
- *The Minnesota Dual-Training Pipeline:* Program was established by the Minnesota Legislature in 2014 to expand dual training in Minnesota. In 2015, additional legislation was passed to create a grant program to help employers fund the related instruction component of dual-training programs. Dual training is an employment-based, earn-as-you-learn program in which the trainee is employed by a participating employer and receives structured on-the-job training and technical instruction in accordance with the competency standards.

Minnesota Department of Education (MDE) — As the entity responsible for management and oversight of Title II funds, MDE works collaboratively with partners within the Combined State Plan to ensure effective and efficient career pathways for Minnesotans. ABE transition coordinators and Local Workforce Development Area directors have developed strong partnerships and continue to convene meetings, identify opportunities for collaboration and planning, and host discussions aimed at meeting regional needs. This work was initially funded, in part, by the WIA Incentive funding that Minnesota received. The state invested much of these earnings into WIOA implementation to achieve better alignment and leveraging of resources and opportunities within the six regions in Minnesota.

New Americans

DEED prioritizes supporting Immigrants and Refugees through establishing the Office of New Americans (ONA). The One Minnesota Budget proposed \$750,000 annually to support the Office of New Americans (ONA). This total included \$250,000 per year to fund agency translation services. Foundation supports funded a temporary ONA, but the One Minnesota Budget proposed using state funds to establish a permanent office. The office focuses solely on supporting immigrant and refugee integration, reducing barriers to employment and improving connections between employers and job seekers. The ONA will lead the state's initiative to provide comprehensive and accessible services to the state's approximately 500,000 immigrants and refugees. The office will organize and lead quarterly interagency efforts to eliminate the barriers immigrants and refugees face by raising awareness of opportunities, educating about the process of accessing services and providing technical assistance. The Office of New Americans will also be the state agency lead on federal immigrant and refugee affairs.

Immigrant and Refugee Resettlement Pipeline Development: The Workforce Strategy team is partnering with the Department of Human Services Immigrant and Refugee Resettlement division to develop a talent pipeline for the immigrant, refugee, and asylee talent coming into state and transitioning into employment opportunities. This partnership is focused on educating DHS staff working with this talent pool on employment and training opportunities providing occupations in demand and family sustaining wages and educating employers on hiring and recruiting from the immigrant and refugee population, resulting in matching talent to employers seeking these skills by region.

Justice-Involved Individuals

The Minnesota Department of Corrections (DOC) has an Employment Services program, the EMPLOY Program, within the state prisons. This program works with releasing incarcerated persons (IP) pre and post release. Services are available to all IPs that are with three and twenty-four months of release. Workforce Development staff are dedicated to offering job search preparation training, to include resume writing, interview techniques, assessing the levels of work readiness and identifying job interest based on skills, past work experience, training and certifications received. As IPs are transition back into the communities throughout the State of Minnesota, other Workforce Development staff provide individualized employment plan development and goal setting. The EMPLOY Program also makes referrals community partners for skills and certification opportunities and access to resources that will reduce or eliminate barriers to employment. Formally IPs receive specific job leads in their area of interest, employment opportunities available at the time of their release, and matched their skills set. The EMPLOY Program provides follow up services post release for up to one and is available for refresher services.

Additionally, the EMPLOY Program has a dedicated Job Developer, to develop businesses and employer relationships though out the State of Minnesota. The Job Developer educates employers on the skills and training of formally incarcerated persons acquired during and incarceration education, career technical certifications and job assignments within the State prisons. Assistance is provided to aide employers to identify their workforce needs/desired skills/training and certifications requirements, discuss hiring practices, market skills and experience of specific candidates, and inform employers of Work Opportunity Tax Credit and Federal Bonding Employer Incentives. The Job Developer aligns services with DEEDs Workforce Strategy Consultants. This partnership with DEED strengthens employer relationships and access to qualified candidates to fulfill their workforce needs.

DOC also leverages DEED Veteran Employment Services to target resources and programming to incarcerated veteran who will be transition back into the community. DEED Veteran Employment Specialists (VES) provide individualized career services to incarcerated Veterans within DOC facilities. A full range of employment and training will be provided to Veterans with significant barriers to employment ~~(SBE)~~. The goal is to empower the Veterans to overcome barriers and to become “job-ready” when they are released on probation or parole. This initiative will contribute to less idle time between leaving the prison setting and employment, which should lead to less recidivism and bolster community reintegration.

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DOC is engaging with DEED Vocational Rehabilitation Services (VRS) to identify available resources, who qualifies for services and how to make referrals. IP will be connected to VRS to gain specialized access to training, preparation, and workplaces accommodations for people with disabilities. VRS provides long-term support for career advancement which will impact Minnesota’s recidivism rates.

PROWD Round 1—DEED is leading the Partners for Reentry Opportunities in Workforce Development (PROWD) Grant Initiative, a comprehensive program aimed at providing tailored career pathways training and support services for individuals currently residing in four Federal Bureau of Prisons (BOP) facilities located in Duluth, Sandstone, Rochester, and Waseca, Minnesota; and, in two Residential Reentry Centers located in Roseville and Minneapolis. The objective is to serve 661 individuals over a three-and-a-half-year period. The proposed major activities encompass assessing participants’ employment readiness, offering pre and post-release employment skills training, cognitive behavioral interventions, and providing educational programs with certifications in construction, business and entrepreneurship, and digital reskilling options.

The expected outcomes of the PROWD initiative are multifaceted, aiming to enhance the capacity of justice and workforce system partnerships across education, employment, and housing. By improving employment outcomes for returning citizens, the program also contributes to public safety and community strengthening by reducing recidivism. DEED is collaborating with various partners and multi-agency working group members from the Minnesota Department of Corrections, Volunteers of America, Residential Reentry Centers, community-based organizations, industry associations, employers, and other government agencies, to ensure the success of the initiative. Overall, the PROWD Grant Initiative reflects a comprehensive approach to reentry and workforce development, addressing the unique needs of individuals transitioning from BOP facilities to Residential Reentry Centers and their communities in Minnesota.

PROWD Expansion—In addition to the PROWD 1 grant, DEED will spearhead a groundbreaking initiative—the Partners for Reentry Opportunities in Workforce Development (PROWD) Expansion grant. This project aims to transform the lives of incarcerated individuals through free and transformative programs and experiences. PROWD Expansion focuses on bridging the educational gap, aligning job training with labor market needs, and improving employment outcomes for returning citizens, while contributing to public safety.

The initiative comprises three key strategies:

1. The Transformation Reentry through Education and Community (TREC) Program, delivered in partnership with educational institutions, targets incarcerated individuals nearing release, offering comprehensive education, skills training, and peer mentoring.

2. A partnership with Repowered aims to provide hands-on training and subsidized employment opportunities in electronics recycling, aligning with environmental sustainability.
3. A collaboration with the Minnesota Governor's Workforce Development Board (GWDB) focuses on addressing labor shortages in high-demand industries, creating apprenticeship and employment opportunities for justice-involved individuals.

The PROWD Expansion grant will specifically serve individuals releasing from the BOP four Federal facilities in Rochester, Duluth, Waseca, and Sandstone, as well as two Residential Reentry Centers in Minneapolis and Roseville. The program goal is to serve 150 individuals over a four-year period of performance. Through these comprehensive efforts, PROWD Expansion seeks to empower individuals with education, skills, and employment opportunities, breaking the cycle of recidivism and fostering safer communities.

DEED has developed and launched the "New Leaf" workshop tailored for individuals who are justice-involved, now accessible virtually to reach a statewide audience. This initiative extends its reach beyond physical locations, providing support to job seekers facing challenges in securing employment due to personal barriers or a criminal history. The workshop seamlessly integrates DEED's Creative Job Search course with specialized strategies to overcome employment obstacles, covering topics such as addressing employers' hiring and retention concerns, efficiently handling tough interview questions, and offering insights into navigating the disclosure of one's criminal history. Additionally, the program provides valuable information on state resources such as the Work Opportunity Tax Credit, Federal Bonding, and "Ban the Box" requirements. Furthermore, DEED's Veteran employment program includes a dedicated DVOP working on special projects to support justice-involved veterans in both state and federal correctional facilities in the state.

State and County Fair Chance Pipeline Development: The Workforce Strategy team is partnering with the Department of Corrections to develop a talent pipeline for people as they exit city, county, and state correctional facilities. This partnership will align DOC education and training programs to match high growth industry training and skill needs to in demand careers providing a family sustaining wage. This partnership is also focused on mapping talent as they leave the correctional system to their county of release, connection to employers seeking skilled talent in those counties prior to release and educating employers on the unique needs of this talent pool allowing for the flexibility to be successful in long term employment.

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.

Services to Laid-Off Adults

Unemployment Insurance — DEED houses the state's Unemployment Insurance (UI) division. CareerForce locations provide co-location for UI staff members to coordinate reemployment initiatives for claimants and the long-term unemployed. The Reemployment Services and Eligibility Assessment (RESEA) engages UI claimants within the first weeks of their benefit

payments to provide earlier engagement and increased services through CareerForce locations to expedite their return to work.

Dislocated Worker Program — This program mitigates the negative impact to businesses, communities, and employees who are facing a layoff. It assists laid-off workers in returning to work with comparable wages and benefits and connects employers with skilled staff.

Participants enrolled in the program can access career planning and counseling; job search and placement services; short-term training upon counselor approval; and support services for expenses such as childcare and transportation upon counselor approval. Minnesota maintains both a federally and state-funded Dislocated Worker program.

State Rapid Response Team — The State Rapid Response Team (SRRT) is the first responder when a business has closed down or is planning to lay off workers. The ~~team~~ SRRT is trained to assess the situation and inform the affected workers of available services, including the Dislocated Worker Program. In 2025, the State Rapid Response Team (SRRT) was moved into the DEED CareerForce Division in order to better coordinate work with employers who were laying off workers or considering layoffs with staff who work with job seekers and employers throughout Minnesota. Participants enrolled in the program can access career planning and counseling; job search and placement services; short-term training upon counselor approval; and support services for expenses such as childcare and transportation upon counselor approval. Minnesota maintains both a federally and state-funded Dislocated Worker program.

Trade Adjustment Assistance (TAA) — Starting in August 2020, the United States Congress did not reauthorize the Trade Act, which resulted in its current sunset stage. Minnesota continued to provide services to participants covered under a TAA petition filed and certified on or before June 30, 2022 and who enrolled by September 30, 2025. As of October 1, 2025, Minnesota is no longer accepting new TAA applications.

~~This program provides aid to workers who lose their jobs, or are at risk of losing their jobs, or whose hours of work and wages are reduced as a result of foreign competition. TAA assists laidoff workers in returning to the workforce as quickly as possible by offering them help with work searches, relocation, job training, and weekly cash benefits. There are two major components, separately funded by the U.S. Department of Labor: Trade Readjustment Allowances (TRA), which are special extensions to unemployment insurance; and Trade Adjustment Assistance (TAA) which includes assistance with training costs, job search allowances, relocation allowances, and similar costs. TAA now uses Electronic Document Storage within the case management database which reduces cost and waste and increases efficiency.~~

Assessments for Job Seekers — Local areas use a variety of assessment instruments across the state, but the most commonly used are the DOL Career One Stop's Interest, Skills and Work Value assessments. Interest and skills assessments are also accessible on CareerForce.MN.gov have been made available on the CareerForceMN.com platform to assist job seekers. Minnesota also developed an "Employment Readiness Profile" assessment on CareerForce.MN.gov that is used across the state. This assessment functions as a triage tool and was developed by Title I and Title III staff. CareerForce.MN.gov also features a ~~In 2021 CareerForceMN.com also released a~~ "Compare Skills" tool that demonstrates how skills of one job transfer to other jobs; and also filters those results to direct seekers to current jobs in demand ~~today~~.

Services to Adults with Barriers to Employment

WIOA Adult – The program serves adults who are seeking greater participation in the labor force and prioritizes individuals who receive public assistance, individuals living with low incomes, and veterans. Minnesota is developing additional policy that leverage state resources to address disparities gaps in race, disability, and disconnected youth which is a priority of this plan. Services include a preliminary assessment of skill levels, support services, occupational or on-the-job training or work-based learning, job search and placement assistance, access to apprenticeship opportunities, and career counseling. It also provides resource libraries providing access to employment-related services such as current job vacancies via total education and training service providers, and labor market information. WIOA Adult providers have been partnering with Adult Career Pathway programming to ensure individuals have access to career pathways that lead to family sustaining wages or beyond.

Minnesota Pathways to Prosperity – Minnesota Pathways to Prosperity (P2P) is an innovative framework built on a Career Pathway programming model, which integrates basic skills education, competency-based skills training, support services, higher-level education for those who chose, employment placement and retention to meet the needs of adults. P2P projects are designed for adults who traditionally face multiple barriers to employment, and who need enhanced educational and supportive services to be successful in securing long-term family sustaining wages. P2P provides opportunities to build their skills through On-Ramp, Bridge, and Individualized Training career pathways models that ultimately lead to employment in an industry sector at a family sustaining wage. This competitively awarded grant program targets populations of color; individuals experiencing housing insecurity; individuals with a criminal record; those lacking a high school diploma or equivalent; individuals with disabilities; and those unemployed for 26 or more consecutive weeks. In addition, special consideration should be provided to veterans, those returning to work after receiving public assistance, low-income, and older workers. Participating individuals obtain, retain, and advance in unsubsidized employment or complete training along an educational path, as demonstrated by annual wage increases, placement and retention in a job or education or training program, and completion of training leading to an industry-recognized credential. P2P is a competitive grant program that is fully funded by the state.

MN Family Resiliency Partnership Program – (formerly displaced homemakers) – This program provides pre-employment services that empower participants to enter or re-enter the labor market. Customers are women and men who have worked in the home for a substantial number of years caring for home and family but, due to separation, divorce, death, or disability of spouse or partner, or other loss of financial support, must now support themselves and their families. These participants often need to address and resolve multiple barriers before they can be competitive in the workforce. Most participants are worried about basic needs for themselves and their families, such as stable housing, caring for a spouse or child with a disability or escaping a violent relationship or situation. Eligibility for this program is based on income guidelines. The six providers offer services covering 51 counties in the State. MN Family Resiliency Partnership is a state-funded program.

Minnesota Family Investment Program (MFIP/TANF) — This program helps families with children meet their basic needs, while helping parents move to financial stability through work. Parents are expected to work and are supported in working with both cash and food assistance. Most families have a lifetime limit of 60 months on MFIP. DEED works with the DHS Economic Assistance and Employment Supports Division to ensure the program goals of MFIP are met.

SNAP Employment and Training Program (E&T) — The Minnesota Department of [Human Children, Youth and Families Services](#) (MN DCYFHS) administers the state's SNAP

Employment and Training Program (SNAP E&T) by supervising local counties and directly contracting with community agencies. Minnesota's SNAP E&T program is built on strong partnerships and offers multiple contracting options. Interested providers can contract through the DCFHS, Minnesota's Department of Employment and Economic Development (DEED), and certain other Minnesota Counties. DCFHS contracts directly with agencies and organizations seeking to offer a range of jobs-driven employment support programs across the state. This includes organizations already receiving a portion of E&T funding through their local county. DCFHS is the contracting agency for all tribal contracts and other state agencies. DEED's SNAP E&T program is available as an enhancement to existing contracts for non-federal funding through DEED. Also, some counties elect to contract with organizations who provide a range of jobs-driven employment supports to low-income residents of the county.

Senior Community Service Employment Program (SCSEP) — The SCSEP program fosters economic self-sufficiency through community service activities for unemployed, low-income persons who are 55 years of age and older and have poor employment prospects. Program clients are Minnesotans with an income of less than 125 percent of the federal poverty levels, who want or need additional income. Service providers include five Local Workforce Development Areas, three community action agencies, three counties, two national sponsors, and one Native American tribe. Program operations are sub-granted to 11 local agencies that serve workers in 60 counties throughout the state; remaining 27 counties are served by national sponsors.

Women in High-Wage, High Demand Nontraditional Jobs Grant Program — This program seeks to increase the number of women in high-wage, high-demand, nontraditional occupations including those in the skilled trades, science, technology, engineering, and math (STEM) occupations. Grant funds serve women, especially low-income women and women over 50 years of age. This is a state-funded grant program, which began in December 2014 and continues.

Migrant and Seasonal Farm Workers — This program provides migrant seasonal farm workers with a full range of employment services and referrals to other community services. Migrant and other seasonal employees engaged in farm work that are legally eligible to work in the United States and of legal age to perform services for wages are eligible for services. The full range of services provided includes: job search assistance and placement, job counseling, training opportunities, and referrals to supportive services and programs. The program is administered by a Job Service supervisor who leads the State Monitor Advocate and migrant labor representatives. Migrant Labor Representatives are fluent in both English and Spanish, to better serve the predominantly Spanish-speaking clientele.

Southeast Asian Economic Disparities Relief Grant Program — This program was implemented in July of 2016 to address economic disparities in Southeast Asian communities through workforce recruitment and development, job creation, assistance to smaller organizations to increase capacity and outreach services. The Minnesota Legislature has funded this program every year since its inception.

Adult support services — This competitive grant focuses on low-income communities, young adults from families with a history of intergenerational poverty, and communities of color to provide support services to individuals, such as job training, employment preparation, internships, job assistance to fathers, financial literacy, academic and behavioral interventions for low-performing students, and youth intervention. The Minnesota Legislature has funded this program every year since its inception.

Youth

- *WIOA Youth Program* — Minnesota's WIOA Youth Program provides comprehensive employment and training services to opportunity youth, including work-based learning, an introduction to career pathways, attainment of recognized credentials and wrap-around support services. Participants are youth ages 16 - 24 who are not attending any school, and in-school youth ages 14-21 who are low-income and at-risk. Minnesota serves a high percentage of youth who are most in need of services such as homeless youth and runaways, youth in foster care, youth with disabilities and youth from families on public assistance. Minnesota is serving youth who are under-represented in the workforce. For example, Native American youth are served at a level that is 3 times the national average. Minnesota supports partnerships with other State and federally funded youth programs to increase the quality of services available to participants. WIOA Youth Programs provide youth with access to postsecondary training and credentials which reflect 21st century skill requirements. Examples of co-enrollment opportunities for WIOA Youth participants include: the Minnesota Family Investment Program (MFIP), Vocational Rehabilitation Services (VRS/Pre-ETS), , Adult WIOA, Adult Basic Education (ABE), Minnesota Youth Program (MYP), Youthbuild, Job Corps and Youth at Work Equity Grants. For more information, see the WIOA Youth Program webpage: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp>.
- *Minnesota Youth Program (MYP)*: MYP serves low-income youth, ages 14 to 24, and is the only youth employment program available in all 87 counties. Over half of the youth served under MYP receive academic credit or service-learning credit for work-based learning. Other MYP services include career exploration and counseling, labor market information on in-demand occupations, work readiness skills, financial literacy training, work experience and support services. MYP serves nearly 3,766 youth each year through individual, case managed services and almost 30,000 youth through the Outreach to Schools component. MYP operates in coordination with WIOA, under oversight of Local Workforce Development Boards appointed by Local Elected Officials (business-led majority). Each \$1 of MYP funds leverages over \$6 of other federal, state and local resources. Youth may be co-enrolled in WIOA, MFIP, VRS, or Youthbuild because of strong local partnerships. Worksite supervisors/employers evaluate the contextual work readiness skills of youth on the MYP worksite using pre and post assessments. For more information, see the Minnesota Youth Program webpage: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/youth-program.jsp>.
- *Youthbuild Program*: The state funded Youthbuild Program offers a construction career pathway for low-income, at-risk youth, ages 16-24, who have dropped out of school or are at-risk of dropping out. Youthbuild provides pre-apprenticeship training, industry-recognized credentials, contextual basic skills and work readiness soft skills; career exploration and counseling; mentoring and leadership development; and support services. Ten organizations provide services across Minnesota. Each \$1 of state Youthbuild funding is matched by one local dollar and state funds are used as match for federal YouthBuild resources. The pandemic impacted services for Minnesota Youthbuild grantees and caused construction projects to be delayed. Local Youthbuild staff pivoted construction training and programming to virtual formats in response to

pandemic restrictions. For more information, see the Youthbuild webpage at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/youthbuild.jsp>.

- *Youth at Work Equity Grants*: provide workforce development and training opportunities for economically disadvantaged and at-risk youth with special consideration for youth from BIPOC communities and youth with disabilities. 86% of the youth served are from BIPOC communities in State Fiscal Year 2023. Experiential learning opportunities are designed for youth that promote mastery of work readiness competencies and 21st Century skills. Projects promote skill acquisition (academic and work readiness) through project-based instruction and increase exposure to in-demand jobs important to regional economies. In response to the COVID-19 precautions, many programs converted programming from in-person to virtual. This meant many youth needed access to internet hot spots, laptops, and other technology to complete required schooling and remote work. Providing these resources to youth ensure low-income youth and BIPOC youth had equitable access to online learning and working. The program served 8215 youth in SFY23. Youth at Work Equity grants provide high-quality worksites and overall participant and employer satisfaction. These are two-year grants that emphasize innovation in serving youth. For more information, see the Youth Equity Grants webpage: <https://mn.gov/deed/programs-services/office-youth-development/special/grants/>.
- *Youth Support Services Grants*: The Minnesota Legislature appropriated \$475,000 in State Fiscal Year (SFY) 2023 for a competitive grant program to provide support services for individuals. Grant funded services include job training, employment preparation, internships, job assistance to parents, financial literacy, academic and behavioral interventions for low-performing students, and youth intervention activities. Grants must serve individuals from low-income communities, and/or young adults from families with a history of intergenerational poverty, and/or BIPOC communities. In SFY 23 were 17 Youth Support Services grantees with 54% of the grant funds allocated to the Twin Cities metro area and 46% allocated to Greater Minnesota. Through these grants, 425 young people received individual services in SFY 23 with over 94% receiving education, employment preparation, or work readiness services. The young people served through these grants were 83% from BIPOC communities, 14% identifying as having a disability, and 47% young women. Detailed program information and reports available at <https://mn.gov/deed/programs-services/office-youth-development/special/youth-support/>
- *Disability Employment Initiative (DEI)*: Partners for Youth Career Pathways - Minnesota is managing a \$2.5 million, 42-month DEI grant funded through the U.S. DOL's Employment and Training Administration and the Office of Disability Employment Policy. This grant allowed three of Minnesota's rural WDAs to strengthen partnerships and strategically align career pathways systems to effectively serve youth with disabilities through multiple entry and exit points. The federal DEI grant allowed Minnesota to expand the number of Employment Networks (ENs) in the state which increases services to Social Security disability beneficiaries. The DEI helped Minnesota build the capacity of rural WDA staff to increase the number of youths with disabilities participating in career pathways programs by implementing the Integrated Resource Team (IRT) approach and the Guideposts for Success best practices framework into service delivery. The DEI grant was successfully closed out in the spring of 2020. For more information on the DEI see the Disability Employment Initiative

weblink: <https://mn.gov/deed/programs-services/office-youth-development/special/disability-employment-initiative/>.

- *DEED, DHS, and MAWB have worked in partnership* since 2009 to serve teen parents receiving Minnesota Family Investment Program (MFIP) benefits or in TANF-eligible households. This partnership has leveraged over \$8.6 million in TANF funds to provide work experience and work-readiness training for over 5,000 teen parents who were receiving MFIP benefits or younger youth who were MFIP recipients. The partnership addresses disparities in MFIP outcomes, especially the Work Participation Rate, for African American and American Indian participants. Many of the participants have little or no previous work experience and they develop work readiness skills through their participation in the project. Participants are assigned a youth counselor/case manager and receive labor market information highlighting in-demand industries and educational opportunities available in the region. Co-enrollment in the WIOA Youth Program and the Minnesota Youth Program, when appropriate, has contributed to the success of these projects.
- The TANF project: has enabled young adults, many of whom have significant barriers to obtaining and maintaining employment, to explore educational opportunities and fulfilling careers that will set them and their families up for lifelong success. A 2018 evaluation report and other TANF Youth Innovation resources and participant success stories can be found on the project webpage: <https://mn.gov/deed/programs-services/office-youth-development/special/tanf/>.

The Minnesota Youth Program (MYP) provides short-term, contextualized and individualized training services for at-risk youth, ages 14 to 24. Coordinated at the local level by the Workforce Development Boards/Youth Committees, MYP eligibility criteria is more flexible (inclusive) than the WIOA Youth Program. MYP serves an extremely disadvantaged group of young men and women: participants have multiple challenges such as substance abuse, criminal records, mental health issues, and cognitive learning limitations, in addition to being poor. The COVID-19 Pandemic caused disruption to established in-person service models. Services to youth that were previously provided in-person shifted to virtual models. Various state and funding sources were leveraged to increase educational access in spite of the pandemic health protocols.

Robotics Teams and STEM Internships Competitive Grant Program

Minnesota's legislature appropriated \$3,000,000 to DEED that would create a competitive grant program focused on supporting high school robotics teams as well as dedicated funds to support youth internships with private sector, STEM-focused employers. The funds were awarded to nine organizations including colleges, school districts, non-profits, and a local workforce development area. The Robotics Teams and STEM Internships Grant program aligns well with federal efforts of the Investing in America Act (IIA) by supporting youth workforce development in high-demand occupations and industries in Minnesota.

Veterans

The Veteran Employment Services is funded by the Jobs for Veterans State Grant (JVSG) from the DOL Veterans Employment and Training Service (VETS). The Jobs for Veterans State Grants (JVSG) program is a staffing grant that provides federal funding, through a formula grant, to 54 State Workforce Agencies (SWAs) to hire dedicated staff to provide individualized career- and

training-related services to eligible veterans and eligible persons with significant barriers to employment (SBE).

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Disabled Veteran Outreach Program (DVOP) representatives are branded as Veterans Employment Specialists. They're veterans too, they are well-versed in workforce development programs and community resources, and they relate very well to the job-seeking veterans. They provide intensive and individualized career services to eligible veterans and other eligible persons which include job-readiness assessment, job search strategy, and placement assistance.

Local Veteran Employment Representatives (LVER), focus on assisting and supporting employers in recruiting, hiring, and retaining veterans. LVERs are veterans too and have immediate access to highly qualified veterans seeking employment. Their goal is to create partnerships between public and private organizations that help veterans successfully transition into civilian employment in Minnesota. LVERs plan and participate in job fairs, reach out to businesses to develop job opportunities for veterans, and educate Minnesota businesses on the value veterans bring to a business. LVERs promote credentialing and licensing programs to veterans. Also, they educate and guide CareerForce staff and partners on veterans Priority of Service and veteran's programs and benefits.

Minnesota implemented several system-wide strategies to ensure veterans are receiving Priority of Service (POS) to access workforce services. These strategies include educating CareerForce staff, screening for veteran status at all points of entry, offering special programs for veterans, priority ranking for job vacancies and access to workshops, annual Veterans Career/Job Fairs, and Veteran Services to employers.

Priority Ranking for Job Vacancies: Minnesota's job bank provides priority of service to all veterans. All new registrants in Minnesota's job bank who check "veteran status" are prompted to answer a series of questions regarding their military engagement. If identified as an eligible veteran, their name goes to the top of the qualified applicant list, and a flag is displayed by their name to designate their veteran status. When employers list job vacancies, they could identify themselves as a "Veteran-Friendly Employer." Private employers are also encouraged to add the verbiage "Veterans Encouraged to Apply" to job postings, per Minnesota State Statute 197.455.

Priority Access to Workshops: Veterans interested in attending career workshops can register for a variety of classes directly from www.careerforcemn.com. Veterans are never turned away from workshop programming.

Veteran Services to Employers: LVERs plan and coordinate outreach to employers interested in recruiting, hiring, and retaining veterans. Many of these employers were proclaimed as Beyond the Yellow Ribbon companies and they are committed to supporting the military-connected individuals and their families. JVSG has implemented Salesforce customer relationship management (CRM) that is used by LVERs and other partners to track contacts with employers and the services provided to them. The CRM system is critical to enhance our customer and business relationships.

LVERs distribute brochures entitled "Minnesota Veterans...Good for Business" to all employers they meet. LVER and partner staff encourage employers to follow a three-step process to recruit and hire veterans:

1. Post your job opening on www.MinnesotaWorks.net
2. Contact a Veterans Employment Representative
<https://www.careerforcemn.com/gov/Veterans>

3. Connect with your local yellow ribbon network <https://mnbyr.ng.mil/Pages/Yellow-Ribbon-Networks.aspx>.

Veteran Services Outreach / Services to Special Populations / Initiatives

Chapter 31 Disabled Veterans

The state will establish a local Memorandum of Understanding with the U.S. Department of Labor - Veterans' Employment and Training Service (DOL/VETS) and the Veterans Affairs (VA) Veteran Readiness and Employment (VR&E) program. This agreement will clearly define the roles and responsibilities of staff across the partner agencies.

The state is committed to delivering vital workforce information to veterans entering the VR&E program and providing priority job search assistance to those completing it. Furthermore, all partner agencies will engage in a quarterly review of VR&E customers to ensure they are making significant progress toward their career goals.

During the pandemic, the state established an electronic mailbox in order for VR&E staff to send encrypted messages and referrals to maintain confidentiality and protect sensitive data.

- JVSG staff Supervisor and VR&E Manager maintained constant communication to address any issues or questions about the Ch-31 veterans case management process.
Chapter 31 Disabled Veterans—The DEED Veterans Intensive Service Coordinator (ISC) is collocating with The Veterans Affairs (VA) Veteran Readiness and Employment (VR&E) Regional office in Fort Snelling. The ISC is responsible for the coordination of initial communication between the Veteran, the VR&E counselor, and the DVOP. DVOPs typically receive notification of an upcoming Chapter 31 disabled Veteran client within 90 days of graduation or upon designation as "job ready" by the VR&E office. When the DVOPs receive the referral from the ISC, they complete a comprehensive assessment and an Individual Employment Plan in collaboration with the referred veterans.
- Homeless Veterans: DEED and MDVA established the Homeless Veteran Registry Cooperation Agreement in 2016 which allows JVSG staff to access a SharePoint database of registered homeless veterans. Through active participation in the Homeless Veteran Registry, and ongoing partnership in Continuum of Care planning efforts, JVSG is visible and available for Veterans experiencing homelessness throughout Minnesota. JVSG partners with MACV staff which serve on Continuum of Care committees and play crucial roles in informing policy and direction, particularly related to Veteran homelessness. Also, per VPL 05-24 JVSG and HVRP partner closely to facilitate dual-enrolling clients to leverage CareerForce resources, MACV's expertise, and services for Veterans experiencing homelessness. Also, per VPL 3-16, JVSG and MACV partner closely to implement dual enrolling clients to leverage CareerForce resources, MACV's expertise, and services for Veterans experiencing homelessness.
- Native American Veterans: Veterans Employment Services serves the Native American Veteran population through the DVOP position in the Bemidji area which includes the Red Lake, Leech Lake, and White Earth Tribal Nations in the northern part of the state. The Bemidji DVOP is collocating with the Tribal Veterans Service Officers (TVSO) at White Earth every Tuesday.
- Women Veterans: Women Veterans represent approximately 17 percent of returning National Guard and Reserve troops in Minnesota. Minnesota Department of Veterans

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Affairs estimates there are almost 23,000 female Veterans in Minnesota. Of that number, about 8700 have served in the Persian Gulf, or OIF/OEF. Minnesota has Veteran staff that is active in different Women's Veterans groups and serves as a liaison with the local DAV chapter. Minnesota currently employs 7 Women Veterans Representatives.

- *Justice-Involved Veterans:* DEED and the Minnesota Department of Corrections have extended the interagency agreement until June 2026 to continue providing intensive employment services and counseling for justice-involved veterans nearing their release date. JVSG staff is assigned as the Justice-Involved Veterans Project Lead and currently attends the steering committee meetings of the Veterans Diversionary Court Program. The court exists to provide an option for veterans who have had encounters with the criminal court system and provide an alternative to prison. Veterans Treatment Courts are modeled after drug courts, which promote collaboration among the judiciary, community corrections agencies, drug treatment providers, and other community support groups.
- *Demobilizing and Transitioning Service Members - Minnesota's "Beyond the Yellow Ribbon" Reintegration Campaign is the backbone of post-deployment reintegration services. MN JVSG staff has been a critical part of this process, which includes five different events for Service members and their families.*
- *The process begins 3-4 months before deployment. "Family Readiness Academies" are designed to allow families to ask questions and provide information to Troops and their families on what to expect during the deployment. DVOP staff provide resource information and referrals for common issues faced by families. Approximately 30 to 60 days before Troops return home, a "Yellow Ribbon Community Event" is sponsored to help families understand and support their returning Soldiers.*
- *Business owners, educators, civic leaders, and law enforcement are called together for a briefing on what they can expect upon their Soldiers' return. JVSG staff provide information on AJC services and community resources. Twenty-six Minnesota service providers send staff and materials to various locations as Troops return from overseas deployment for an Initial Reintegration Event.*

The Beyond the Yellow Ribbon Program - On May 4th, 2022, Governor Tim Walz of Minnesota proclaimed the Minnesota Department of Employment and Economic Development a Beyond the Yellow Ribbon (BTYR) Organization. BTYR Company Program pays tribute to those organizations with an exceptional record of support, commitment, and compassion for servicemembers, veterans, and their families through various programs, policies, and public works

- *Demobilizing Veterans and Recently Separated Veterans:* Minnesota's "Beyond the Yellow Ribbon" Reintegration Campaign is the backbone of post deployment reintegration services. Minnesota DVOP/LVER staff have been a critical part of this process which includes five different events for Service members and their families.
 - The process begins 3-4 months before deployment. "Family Readiness Academies" are designed to allow families to ask questions and provide information to Troops and their families on what to expect during the deployment. DVOP staff provide resource information and referrals for common issues faced by families. Approximately 30 to 60 days before Troops return

home, a "Yellow Ribbon Community Event" is sponsored to help families understand and support their returning Soldiers.

- Business owners, educators, civic leaders, and law enforcement are called together for a briefing on what they can expect upon their Soldiers' return. LVER and DVOP staff provide resource information, and answers to some difficult questions relating to their combat experience, and how that may affect their lives. Twenty-six Minnesota service providers send staff and materials to various locations as Troops return from overseas deployment for an Initial Reintegration Event. DVOP staff conduct group presentations and work one-on-one to provide information on workforce services available.

Adult Learners

Minnesota's Department of Labor and Industry (DLI): is Minnesota's agency responsible for expanding registered apprenticeships in Minnesota. In addition to registered apprenticeship, DLI administers two other employment-based training programs: Minnesota Dual-Training Pipeline and Youth Skills Training. DEED collaborates with the Department of Labor and Industry to align workforce needs along with other statewide workforce partners. DLI is the lead state agency in developing apprenticeships in traditional and emerging industry sectors in partnership with the core partners in this plan. In addition, DLI is also the lead agency in identifying and establishing opportunities that may lead to registered apprenticeships.

- *Registered apprenticeship programs:* support Minnesota's economy by fostering and promoting employment-based career development through structured training, development and credentialing of highly skilled employees. Minnesota's registered apprenticeship system was launched in 1939, and since then has trained over 110,000 apprentices. Currently, the Department of Labor and Industry supports over 200 registered apprenticeship in several industries, including construction, utilities, transportation, agriculture, healthcare and education. These programs prepare Minnesota's 11,000 apprentices to compete in a global economy through a time-tested employee training system that combines job related technical instruction with related on-the-job learning.
- *The Minnesota Dual-Training Pipeline:* Program was established by the Minnesota Legislature in 2014 to expand dual training in Minnesota. In 2015, additional legislation was passed to create a grant program to help employers fund the related instruction component of dual-training programs. Dual training is an employment-based, earn-as-you-learn program in which the trainee is employed by a participating employer and receives structured on-the-job training and technical instruction in accordance with the competency standards.

Minnesota Department of Education (MDE) — As the entity responsible for management and oversight of Title II funds, MDE works collaboratively with partners within the Combined State Plan to ensure effective and efficient career pathways for Minnesotans. ABE transition coordinators and Local Workforce Development Area directors have developed strong partnerships and continue to convene meetings, identify opportunities for collaboration and planning, and host discussions aimed at meeting regional needs. This work was initially funded, in part, by the WIA Incentive funding that Minnesota received. The state invested much of these earnings into WIOA implementation to achieve better alignment and leveraging of resources and opportunities within the six regions in Minnesota.

New Americans

DEED prioritizes supporting Immigrants and Refugees through establishing the Office of New Americans (ONA). The One Minnesota Budget proposed \$750,000 annually to support the Office of New Americans (ONA). This total included \$250,000 per year to fund agency translation services. Foundation supports funded a temporary ONA, but the One Minnesota Budget proposed using state funds to establish a permanent office. The office focuses solely on supporting immigrant and refugee integration, reducing barriers to employment and improving connections between employers and job seekers. The ONA will lead the state's initiative to provide comprehensive and accessible services to the state's approximately 500,000 immigrants and refugees. The office will organize and lead quarterly interagency efforts to eliminate the barriers immigrants and refugees face by raising awareness of opportunities, educating about the process of accessing services and providing technical assistance. The Office of New Americans will also be the state agency lead on federal immigrant and refugee affairs.

Immigrant and Refugee Resettlement Pipeline Development: The Workforce Strategy team is partnering with the Department of Human Services Immigrant and Refugee Resettlement division to develop a talent pipeline for the immigrant, refugee, and asylee talent coming into state and transitioning into employment opportunities. This partnership is focused on educating DHS staff working with this talent pool on employment and training opportunities providing occupations in demand and family sustaining wages and educating employers on hiring and recruiting from the immigrant and refugee population, resulting in matching talent to employers seeking these skills by region.

Justice-Involved Individuals

The Minnesota Department of Corrections (DOC) has an Employment Services program, the EMPLOY Program, within the state prisons. This program works with releasing incarcerated persons (IP) pre and post release. Services are available to all IPs that are with three and twenty-four months of release. Workforce Development staff are dedicated to offering job search preparation training, to include resume writing, interview techniques, assessing the levels of work readiness and identifying job interest based on skills, past work experience, training and certifications received. As IPs are transition back into the communities throughout the State of Minnesota, other Workforce Development staff provide individualized employment plan development and goal setting. The EMPLOY Program also makes referrals community partners for skills and certification opportunities and access to resources that will reduce or eliminate barriers to employment. Formally IPs receive specific job leads in their area of interest, employment opportunities available at the time of their release, and matched their skills set. The EMPLOY Program provides follow up services post release for up to one and is available for refresher services.

Additionally, the EMPLOY Program has a dedicated Job Developer, to develop businesses and employer relationships though out the State of Minnesota. The Job Developer educates employers on the skills and training of formally incarcerated persons acquired during and incarceration education, career technical certifications and job assignments within the State prisons. Assistance is provided to aide employers to identify their workforce needs/desired skills/training and certifications requirements, discuss hiring practices, market skills and experience of specific candidates, and inform employers of Work Opportunity Tax Credit and Federal Bonding Employer Incentives. The Job Developer aligns services with DEEDs Workforce Strategy Consultants. This partnership with DEED strengthens employer relationships and access to qualified candidates to fulfill their workforce needs.

DOC also leverages DEED Veteran Employment Services to target resources and programming to incarcerated veteran who will be transition back into the community. DEED Veteran

Employment Specialists (VES) provide individualized career services to incarcerated Veterans within DOC facilities. A full range of employment and training will be provided to Veterans with ~~significant barriers to employment (SBE)~~. The goal is to empower the Veterans to overcome barriers and to become “job-ready” when they are released on probation or parole. This initiative will contribute to less idle time between leaving the prison setting and employment, which should lead to less recidivism and bolster community reintegration.

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DOC is engaging with DEED Vocational Rehabilitation Services (VRS) to identify available resources, who qualifies for services and how to make referrals. IP will be connected to VRS to gain specialized access to training, preparation, and workplaces accommodations for people with disabilities. VRS provides long-term support for career advancement which will impact Minnesota’s recidivism rates.

PROWD Round 1—DEED is leading the Partners for Reentry Opportunities in Workforce Development (PROWD) Grant Initiative, a comprehensive program aimed at providing tailored career pathways training and support services for individuals currently residing in four Federal Bureau of Prisons (BOP) facilities located in Duluth, Sandstone, Rochester, and Waseca, Minnesota; and, in two Residential Reentry Centers located in Roseville and Minneapolis. The objective is to serve 661 individuals over a three-and-a-half-year period. The proposed major activities encompass assessing participants’ employment readiness, offering pre and post-release employment skills training, cognitive behavioral interventions, and providing educational programs with certifications in construction, business and entrepreneurship, and digital reskilling options.

The expected outcomes of the PROWD initiative are multifaceted, aiming to enhance the capacity of justice and workforce system partnerships across education, employment, and housing. By improving employment outcomes for returning citizens, the program also contributes to public safety and community strengthening by reducing recidivism. DEED is collaborating with various partners and multi-agency working group members from the Minnesota Department of Corrections, Volunteers of America, Residential Reentry Centers, community-based organizations, industry associations, employers, and other government agencies, to ensure the success of the initiative. Overall, the PROWD Grant Initiative reflects a comprehensive approach to reentry and workforce development, addressing the unique needs of individuals transitioning from BOP facilities to Residential Reentry Centers and their communities in Minnesota.

PROWD Expansion—In addition to the PROWD 1 grant, DEED will spearhead a groundbreaking initiative—the Partners for Reentry Opportunities in Workforce Development (PROWD) Expansion grant. This project aims to transform the lives of incarcerated individuals through free and transformative programs and experiences. PROWD Expansion focuses on bridging the educational gap, aligning job training with labor market needs, and improving employment outcomes for returning citizens, while contributing to public safety.

The initiative comprises three key strategies:

1. The Transformation Reentry through Education and Community (TREC) Program, delivered in partnership with educational institutions, targets incarcerated individuals nearing release, offering comprehensive education, skills training, and peer mentoring.
2. A partnership with Repowered aims to provide hands-on training and subsidized employment opportunities in electronics recycling, aligning with environmental sustainability.

3. A collaboration with the Minnesota Governor's Workforce Development Board (GWDB) focuses on addressing labor shortages in high-demand industries, creating apprenticeship and employment opportunities for justice-involved individuals.

The PROWD Expansion grant will specifically serve individuals releasing from the BOP four Federal facilities in Rochester, Duluth, Waseca, and Sandstone, as well as two Residential Reentry Centers in Minneapolis and Roseville. The program goal is to serve 150 individuals over a four-year period of performance. Through these comprehensive efforts, PROWD Expansion seeks to empower individuals with education, skills, and employment opportunities, breaking the cycle of recidivism and fostering safer communities.

DEED has developed and launched the "New Leaf" workshop tailored for individuals who are justice-involved, now accessible virtually to reach a statewide audience. This initiative extends its reach beyond physical locations, providing support to job seekers facing challenges in securing employment due to personal barriers or a criminal history. The workshop seamlessly integrates DEED's Creative Job Search course with specialized strategies to overcome employment obstacles, covering topics such as addressing employers' hiring and retention concerns, efficiently handling tough interview questions, and offering insights into navigating the disclosure of one's criminal history. Additionally, the program provides valuable information on state resources such as the Work Opportunity Tax Credit, Federal Bonding, and "Ban the Box" requirements. Furthermore, DEED's Veteran employment program includes a dedicated DVOP working on special projects to support justice-involved veterans in both state and federal correctional facilities in the state.

State and County Fair Chance Pipeline Development: The Workforce Strategy team is partnering with the Department of Corrections to develop a talent pipeline for people as they exit city, county, and state correctional facilities. This partnership will align DOC education and training programs to match high growth industry training and skill needs to in demand careers providing a family sustaining wage. This partnership is also focused on mapping talent as they leave the correctional system to their county of release, connection to employers seeking skilled talent in those counties prior to release and educating employers on the unique needs of this talent pool allowing for the flexibility to be successful in long term employment.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

The Workforce Strategy Consultants (WSCs) serve as one of DEED's primary employer engagement teams. The six WSCs provide services in Minnesota's six workforce regions offering regional integrative expertise of in-demand sectors, talent pipelines, partnerships, and economic development opportunities. Their primary focus is to develop innovative workforce solutions with businesses, within high growth sectors that will provide family sustaining wages. This is accomplished through a customized consultative process driven by regional data, state data, best practices, employer goals, community supports and resources. By aligning these resources, WSCs facilitate collaboration, leverage expertise, drive regional economic equity, and growth. The WSCs provide value to communities through leveraging their expertise in industry

sector workforce strategies, connecting key stakeholders to workforce development, highlighting economic development resources, and supporting businesses.

The WSCs regional work is highly successful due to the strong partnership with LWDAs, employers, education partners, community organizations along with DEED's regional employer outreach teams, which include Business Development Managers, Job Service Managers, Layoff Aversion (Rapid Response) Specialists, Veterans Representatives, Vocational Rehabilitation, Grant Specialists, Labor Market Analysts, and GWDB. The WSCs enhance economic prosperity while assisting key stakeholders in the successful implementation of the WIOA Local and Regional plans.

Achieving Equity: DEED prioritizes addressing disparities and achieving economic equity for all Minnesotans by identifying and breaking down barriers to employment and business opportunities. The data on populations served has highlighted many available career opportunities. Additionally, WSCs have placed a focus on providing resources to minority-owned businesses and connecting organizations that serve Immigrant and Refugee populations, and communities of color with Minnesota's employers seeking qualified applicants.

The USDOL requires us to report on the "Effectiveness for Serving Employers" annually. Below, find the final numbers SFY 2022 (or WIOA Program Year 2021) that we supplied in our WIOA Annual Report Narrative.

Employer Services	Establishment Count PY22	Establishment Count PY21
1. Employer Information and Support Services	153	101
2. Workforce Recruitment Assistance	4,590	8,127
3. Strategic Planning/Econ Dev. Activities	323	1,759
4. Untapped Labor Pools Activities	2,451	903
5. Training Services	119	305
5b. Incumbent Worker Training Services	121	160
6. Rapid Response/Business Downsizing Assistance	71	183
6b. Planning Layoff Response	76	146
Employer Penetration	3.5%	6.3%
Total (De-duplicated)	7,087	10,145
QCEW	199,953	162,058
Retention with Same Employer	46.7%	44.6%

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Employer Services	Establishment Count PY22	Establishment Count PY21
Same Employer Q2 Q4	12,691	12,342
Employed Q2	27,179	27,646

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Annually, ABE providers work with more than 300 employer sites through a variety of strategies. Workplace literacy and Integrated Education and Training (IET) are specialized programs that help ABE providers meet employee and employer needs. In Program Year 2022, nearly 1,600 ABE participants were participating in a workplace literacy or IET program. Many ABE providers also connect learners with employers through site visits, job fairs, and hiring/recruitment efforts. The Minnesota Department of Education is working with providers to increase employer collaborations and the number of IET and workplace literacy options, especially through the use of regional transitions funding and with additional local collaborations.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS AND OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

State Educational Attainment Goal

In 2015, the Minnesota Legislature set in statute the goal of 70 percent or more of Minnesota residents ages 25 to 44 to hold a postsecondary degree or certificate by 2025. This law emphasized the importance of achieving comparable attainment rates across all race and ethnicity groups. OHE is tasked with reporting on progress towards this goal annually, with progress reports by race and ethnicity groups.

DEED serves as a key stakeholder in this effort to increase educational attainment levels because of our role in administering workforce training programs for adults and youth with barriers to entry, particularly those from communities of color. Approximately 37 percent of CareerForce customers do not have education beyond a high school diploma or GED. Providing customers access to education and training opportunities – including information on the education required for Minnesota's current and future in-demand jobs – will support the state attainment goal.

Transparency of Educational Outcomes

In 2015, the Minnesota Legislature also set in statute the higher education reporting requirements for institutions that participate in state financial aid programs administered by OHE. These requirements included enrollment and graduation data; financial aid information; cumulative debt of graduates by race and ethnicity, gender, and income; persistence and completion; and employment and wage outcomes.

DEED remains a key partner with OHE in this push towards transparency of educational outcomes. Data on institution-level employment and wage outcomes by program of study (i.e.

major) are produced by DEED and displayed in the Graduate Employment Outcomes (<https://mn.gov/deed/geo>) Tool, a product of the Labor Market Information Office.

Education and Workforce Alignment

Minnesota has a fully interoperable, enterprise-level data collection, reporting and analysis system that stores student data from pre-kindergarten through completion of postsecondary and into the workforce. These systems include:

- The Statewide Longitudinal Education Data System (SLEDs), which is led by OHE and brings together data from MDE, DEED and OHE and other agencies.
- The Early Childhood Longitudinal Data System (ECLDS), which is led by OHE and brings together data from MDE and the Minnesota Departments of Health (MDH) and Human Services (DHS).
- SLEDs brings together data from education and workforce to identify the most viable pathways for individuals in achieving successful outcomes in education and work. It is used to inform decisions to support and improve education and workforce policy and assist in creating a more seamless education and workforce system for all Minnesotans. The general purpose of the SLEDs system is to identify and analyze the 4 P's of Minnesota's education and workforce systems:
 - Pathways: The movement of individual students between K-12, higher education, and workforce
 - Progress: The benchmarks transition points students meet or fail to meet
 - Predictors: The characteristics or patterns that help explain which students succeed and which do not
 - Performance: How well are education and workforce aligned for individual success?
- In 2023, Minnesota received a 4-year national SLEDs grant through the Institute for Education Sciences (IES) with a focus on early learning and college and career. The grant projects will expand SLEDs use to better inform and improve education programming, workforce development reporting, policies and resource allocation decisions. The projects supported increased use of SLEDs, improve key stakeholders' data literacy, added linkages to important additional data and improved data quality.
- Adult Education (ABE) works with the Minnesota State college system and DEED to evaluate adult learners' entry into postsecondary and employment. As part of the SLEDs work, specialized SLEDs reports were developed that measure adult education participants statewide and by grantee to see their activity prior to entering Adult Education, the demographics of the participants, post-ABE activities and long-term outcomes, beyond what is measured through the National Reporting System.

F. 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.

Minnesota's registered apprenticeships are administered through the Department of Labor and Industry. The agency also oversees the following programs and services:

- Occupational Safety and Health (OSHA)
- Construction Codes and Licensing
- Workers' Compensation
- Labor Standards
- Dual-Training Pipeline
- Youth Skills Training

Registered apprenticeship fosters and promotes work-based career development. This unit develops and registers apprenticeship programs and promotes workforce diversity through outreach and education. The Dual-Training Pipeline supports employers in building their own dual-training programs, which combine structured on-the-job training with formal related education, and the Youth Skills Training supports partnerships among schools, employers and community organizations to provide safe, healthy and meaningful paid work experiences to students 16 and older.

Trades and occupations active in Minnesota registered apprenticeship are Utilities, Construction, Advanced Manufacturing, Health Care, Transportation, Agriculture, Public Sector, and Information Technology.

Opportunities for Local and Regional Workforce Development Boards include convening stakeholders, serving as an intermediary, and braiding funding sources to support registered apprenticeship programs.

G. 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.

To better support Minnesota businesses, the DEED Economic Development Business Development division is utilizing grant funding to work with The Improve Group consulting team to simplify the Minnesota workforce development system and build talent pipelines in targeted and in demand occupations. The Improve Group is working across Business Development, Workforce Development, and the Governor's Workforce Development Board divisions to build synergy across Business Development, Minnesota Job Skills Partnership, Workforce Strategy, Employment and Training Programs, CareerForce, and the Governor's Workforce Development Board to match the needs of our existing industry and prospects around workforce recruitment, development, and training more effectively. Outcomes will include an analysis of best practices from 10 other states, identification of process improvement

opportunities, streamlining of services, and an overall increase in collaboration and coordination resulting in an improved service to mission and shared goals.

B. STATE OPERATING SYSTEMS AND POLICIES

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section

II Strategic Elements. This includes—

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

Labor Market Information Systems

The state's Labor Market Information (LMI) office gathers, analyzes, and disseminates economic data on Minnesota's business community, workforce, and job market. It also provides:

- Key economic indicators
- Employment projections
- Job vacancy data
- Regional and statewide industry and workforce analysis
- Information and tools to help individuals make informed career decisions

Key customers include businesses, job seekers, students, economic developers, education and training planners, workforce development professionals, policymakers, researchers and economists, government entities, media, and the general public.

For job seekers and career counselors specifically, the office has developed web tools that combine a range of data relevant to career decision-making:

- The My Goals and Experience feature on CareerForceMN.com provides a wide range of occupational information, including wages, current and future demand, education and training resources, and job opportunities. The Regional and industry pages on CareerForceMN.com provide easier access to local and regional employment information. Regional pages provide local wage, demand and other information for each of Minnesota's six regions, as well as workforce-related blog and news content specific to each region.
- The Graduate Employment Outcomes tool on mn.gov/deed shows how many Minnesota college graduates found jobs and at what wages. Outcomes are available at an institution and program of study level.
- The tool on mn.gov/deed provides a yearly estimate of the basic—needs cost of living in Minnesota by county, region, and statewide. The tool can be customized by family size and number of workers.

The Labor Market Information office's telephone and email helpline respond to thousands of data and information requests per year. A team of six regional labor market analysts, stationed within Local Workforce Development Areas, give hundreds of public presentations every year on economic conditions, workforce issues and key industries to key internal and external

stakeholders. They also provide analytical and grant-writing support on demographic and labor force topics, and customized support to organizations involved in regional planning.

To leverage existing career information tools — and to meet the requirements of WIOA to maintain and publish lists of eligible training providers and programs — DEED built an integrated Eligible Training Provider List (ETPL) database and an online Career and Education Explorer tool, which launched in 2016.

The ETPL Training Provider Portal is a secure database and data entry portal to house and maintain Minnesota's official ETPL. This portal is available to training providers who meet the requirements for listing in Minnesota and it allows trainers to manage their own program listings. By policy, training providers will be required to validate the accuracy of their program data every two-years.

The Career and Education Explorer web tool allow the public to search for educational opportunities in Minnesota, including those that result in an industry-recognized credential. Enhanced labor market data is provided to allow users to explore occupations and to find related training opportunities.

Data Systems

Uniform Report Card – DEED measures the performance of all the programs it funds or provides at the state level. The Report Card shows activities and employment outcomes for select workforce development programs by education level, race, ethnicity, gender and geography. Because this web-based tool is regularly updated, accessing the link provides current data not available on a static point-in-time chart.

WIOA Annual Report – System management is a coordinated effort of the GWDB, state agencies and programs that are part of the WIOA State Plan, regional workforce development entities and local workforce development boards. The most recent program data can be found in the WIOA Annual Report.

Performance and Technical Management (PTM)– DEED administrators inform strategic direction by providing data-driven analysis and context to those who use, deliver and fund the Minnesota economic and workforce development systems. The Performance and Technical Management Office's three core functions are information analysis, management analysis and outreach. Most recently, PTM worked with CareerForce to identify methods for targeting those needing services the most and applied the Social Vulnerability Index to Title I and III programs to better understand if we are serving the most vulnerable Minnesotans in the state.

Workforce One (WF1) – found at www.mnworkforceone.com, is a web-based client management application used by nearly 2,000 state, city, county, and non-profit employment and training providers to track employment and training services to more than 100,000 customers across Minnesota's One Stop network. WF1 was created through a partnership between the Department of Human Services (DHS) and the Department of Employment and Economic Development (DEED) and is maintained by MNIT-DEED.

WF1 Connect – is a mobile app that customers can download to communicate with their Employment Services Counselor and/or Financial or Childcare Worker. The app was developed by MNIT-DEED in partnership with DEED, DHS, and subject-matter experts from DEED's Performance and Technical Management (PTM) team.

A project is underway to replace MinnesotaWorks.net and integrate the labor exchange into CareerForceMN.com

Communications Systems

DEED makes a concerted effort to communicate job and training opportunities to job seekers through GovDelivery, our email marketing tool. Enhanced communications with employers and customers are supported by DEED's Communications Office.

In 2023, DEED added 35,000 new subscribers to this email tool, with the total number of subscribers currently at 1,237,21 — with half of those being job seekers. A total of 1,541 email bulletins were sent to subscribers, with the majority of those emails being to job seekers and employers in the state. Overall, DEED emails for the year were sent to a total of 52,189,846 recipients.

Under the Workforce Investment Act, DEED operated as the lead on writing, soliciting feedback, publishing, and enforcing policies. Under the Workforce Innovation and Opportunity Act, DEED still performs many of these duties, but engages other partner state agencies to ensure continuity and shared awareness in coordination with the GWDB.

DEED plans to publish policies that address cross-agency program co-enrollment. In practice, most core programs use Workforce One, the state's client management information system, to encourage co-enrollment across programs. The allowable co-enrollment in this system serves as Minnesota's policy. DEED staff will follow-up to publish formal guidance on program co-enrollment. Currently there is co-enrollment activity between several federal programs with state programs. A prime example of how co-enrollment is considered involves dislocated workers. Depending upon the scenario, a dislocated worker may have options for federal and state dislocated worker support, such as a TAA grant, depending upon the type and category of lay-off that has occurred.

Universal intake processes have some layers in Minnesota. All individuals who access job seeker support services via CareerForce and through Minnesota's labor exchange system are accessing programs funded through Wagner-Peyser's Employment Service Program. Many of those customers seek deeper services with counselors that require program enrollment. In those cases, the majority of WIOA enrolled customers are co-enrolled with Wagner-Peyser Employment Service Program, but the opposite is not true. Service providers in Minnesota will continue to work to make the program enrollment process as seamless as possible to the customer.

Minnesota fulfills its obligation to provide guidance on infrastructure cost allocation procedures to be reflected within the memorandums of understanding through an existing policy put in place in 2018. DEED is currently facilitating discussion on a new IFA policy and procedure that will improve the process for the one-stop system and all its required partners. Additionally, DEED is working with across one-stop system partners to support negotiations for the upcoming round of IFAs and MOUs.

Minnesota adheres to all current rules and regulations pertaining to the selection of one-stop operators as dictated by WIOA. Minnesota's one-stop system, the "CareerForce" system, has 51 comprehensive and affiliate locations. The infrastructure costs as well as the additional costs of operating these locations are allocated based on the infrastructure funding agreements attached to the memorandums of understanding in each of Minnesota's 16 local workforce development areas.

Infrastructure Funding Agreements (IFAs)

As Minnesota is in the process of updating the IFA policy, what follows is an outline of current guidance provided to the system on Infrastructure Funding Agreements.

IFAs must be submitted at least every 3 years for each CareerForce Center (CFC) to ensure that all required CareerForce partners are equitably contributing to the costs of the CareerForce System, as defined in WIOA. The IFA will be included in every Local Workforce Development Area's (LWDA) Memorandum of Understanding (MOU). In the wake of changing guidance on these agreements, in Minnesota in coordination with guidance received from the United States Department of Labor (DOL), we guide the IFA process in the following ways.

An IFA must be submitted at least every 3 years for each CareerForce Center (CFC) to ensure that all required CareerForce partners are equitably contributing to the costs of the CareerForce System. The IFA recognizes the shared resources of key partners delivering workforce development and related services. Mutual consent and cooperation of all partners is an essential part of the IFA process. IFAs are guided by the Coordination Unit of DEED's Administrative and Financial Services Division.

The IFA must be completed and submitted to DEED for the CFC prior to the expiration date of the current IFA. Participants in an IFA can request the IFA to be amended if a material change occurs during the covered period.

If the IFA is not submitted and finalized in a timely manner as described above, the existing IFA will remain in place until a new IFA is agreed to. If the local board reports to DEED and the GWDB that an impasse cannot be resolved, the State Funding Mechanism (SFM) replaces any operational cost sharing agreement in place at the CareerForce Center.

WIOA as well as federal Department of Labor (DOL) and Minnesota Management and Budget (MMB) guidelines require that all actual and required partners in a CFC share benefitting expenses associated with infrastructure. Minnesota's IFA policy recognizes the principles of proportionate use and relative benefit and applies it to all required WIOA titles, with different principles for co-located and non-co-located required partners. This policy details the approach and process for both scenarios. WIOA requires the following programs to contribute to infrastructure costs of the CareerForce system:

1. WIOA Title I - Adult, Dislocated Worker, Youth and YouthBuild
2. WIOA Title II – Adult Education and Family Literacy
3. WIOA Title III – Wagner-Peyser Employment Service Program
4. WIOA Title IV – Vocational Rehabilitation Services/State Services for the Blind
5. National Farmworker Jobs Program
6. OAA, (Older Americans Act) Title V – SCSEP (Senior Community Service Employment Program)
7. Temporary Assistance for Needy Families
8. Supplemental Nutrition Assistance Program E&T
9. Career & Technical Education Programs (post-secondary)
10. Trade Adjustment Assistance
11. Jobs for Veterans State Grants
12. Community Services Block Grant E&T
13. Housing & Urban Development E&T

14. Unemployment Insurance

15. Job Corps

16. Native American Programs (contribution is optional for Native American Programs.

Additionally, they must be part of the MOU, but their participation in the IFA is optional)

Local Funding Mechanism

Co-Located Partners Procedure for Completing IFAs

CareerForce partners are required to follow this procedure in completing and submitting their IFAs:

- DEED can provide necessary customer data from Workforce One (WF1) and the labor exchange data, as well as the previous approved IFA.
- Local partners will negotiate costs with local partners, obtain all necessary local signatures on the IFA, and send the IFA either electronically or physically to DEED no later than the last week of May prior to the IFA's effective program year date.
- DEED will obtain necessary central DEED signatures on the IFAs prior to its effective date. If central DEED authorities disagree with any aspect of an IFA and refuse to sign it, DEED will notify local partners of this no later than one week after the IFA has been submitted to DEED in order to allow adequate time for an agreement to be reached.

DEED will keep central records of all IFAs.

Career Lab Costs

This includes the associated costs of running a Career Lab resource room supported by the State of Minnesota. This includes Wide Area Network (WAN) Internet costs; public-use computers; public-use printer, scanner, fax machines; and the Cybrarian software used to secure and track activity. The State Funding Mechanism appeals process per 121(h)(2)(D) is described in State Policies and Guidance, however, the responsibility for IFAs has transitioned to DEED's Administration and Financial Services Division and current policies are under review.

Other Sub-Lease or Space Rental Agreements: Note on situations of special space rental not reflected within the IFA- if any organization that is allocated space within an IFA wishes to rent some of their space to any other organization outside of the IFA, they may do so. The particulars of this agreement don't need to be tracked in the IFA if the space is accounted for within the IFA and allocated to the organization responsible for it.

Security and/or Site Management Costs

Some CFCs allocate "Site Management" costs. Site Managers take on the business of the facility they are located in and handle things such as communication with landlords on matters of snow removal, ordering supplies, and/or keeping usage logs of conference room space up to date. These must be considered as in-kind contributions of time.

Some CareerForce Centers allocate "Security" costs such as the cost of security guards on site. Other security costs that could be allocated according to the above formula instead of directly to one program could include examples like the following: a new lock system in the front entrance of the facility; security cameras throughout the facility; a panic button and announcement system.

Methodologies Described

Dedicated Space. Dedicated space is space that is used exclusively by a CareerForce partner. Examples could include office, meeting or storage space. The partner agrees to pay for their dedicated space 100% of the time, whether occupied or not, within the lease period.

Usage Logs/Metering. Usage logs are records of how space or items were used. Examples could include a sign-up sheet for shared meeting space. Partners agree to pay their percentage of total usage for the cost of the item being tracked in this manner.

FTEs. The number of full-time equivalents on site. Staff with office space at multiple sites may not be counted as more than one FTE, with fractions totaling one FTE being allocated across the multiple sites. Vacant or unfilled positions must be included in the FTE count.

Workforce One Data (WF1). Workforce One participant enrollments can be used for allocating costs of operations. However, the breakdown of these costs are still subject to local negotiation of partners involved.

Exemptions – Program exemptions from allocation of certain costs are allowed if the program can document/attest to the fact that these customers do not receive direct services out of their assigned (by WF1) CareerForce. Exemptions must be approved by DEED and included in this section of the IFA policy. Current exemptions include:

- Youth participants from Title IB and Title IV
- MFIP participants receiving services in non-CFC counties
- Title VII program of State Services for the Blind, (SSB"u" only, not SSB"w"), for visually impaired individuals

Career Lab Costs. Career Lab costs are negotiated by CareerForce system partners at the local and regional level. Quantitative metrics should be used when appropriate for allocating costs of a Career Lab. If this issue becomes an impasse issue for the local board or rises to the State Board for resolution.

Total Dedicated and Shared Space. The sum of dedicated and shared space indicated on an IFA.

Reconciliation

If usage data or other changes that affect any allocations of the IFA deviate more than 5% during a biannual review, this is a material change and adjusting reconciliation payments will be required. If the review identifies material changes during consecutive bi-annual reviews a new IFA must be completed at a minimum on a quarterly basis and will be coordinated by DEED.

If all local partners agree that a new IFA is not needed or desired, then they can inform DEED of this decision and the current IFA will stay in effect for another year. At the end of that year, one or more partners may again request to negotiate a new IFA. If all partners agree, the existing IFA may be retained through the original ending date.

IFA Amendments

If a substantial change, (with "substantial change" generally interpreted as a more than 5% deviation of any allocation percentages within the IFA), as interpreted by local management, occurs within a CareerForce Center local partners can request that the IFA be amended to reflect the actual allocation of infrastructure costs more accurately in the location. Examples of

how this could happen include but are not limited to a number of staff either enter or exit the location; the size of the leased space decreases or increases; many computers that use MN.IT internet are installed at the location.

Non-Co-Located Partners Procedure for Completing IFAs

A non-co-located partner is defined as a partner who does not have a physical presence at one CareerForce Center per local area. Non-Co-Located Partners are required to participate in the costs of at least one CareerForce Center in each local area. Programs that have multiple providers within a local area are viewed as one program, requiring that only a single contribution be agreed to by the state agency that oversees that program.

Local Boards are encouraged to work with non-co-located partners to assess an appropriate contribution to the IFA, based on proportionate benefit of the use of the CareerForce system. These partners should produce some form of documentation to share with the board to make this determination.

If this can't be achieved, it is recommended that a process be applied that assumes proportionate benefit can be assessed based on the distribution of their program eligible individuals within each of the local areas and the recognition of total financial contributions equaling 1.5% of the State's total federal allocation for that program based on the current Federal fiscal year funding for the program. The following table illustrates this process to establish the required contribution within each local area.

Federal Title	Title's Total Federal Allocation	1.5% IFA Contribution
"X"	\$1,000,000	\$15,000

Eligible Program Population by Local Workforce Development Area

#1	#2	#3	#4	#5	#6	#7	#8	#9	#10
20%	3%	15%	10%	15%	10%	10%	5%	10%	2%
\$3,000	\$450	\$2,250	\$1,500	\$2,250	\$1,500	\$1,500	\$750	\$1,500	\$300

These contributions can be achieved in two ways – cash contributions or in-kind contributions.

Cash Contributions: Cash contributions must be documented and included in the IFA. Two examples of cash contributions are:

- Cash contributions to the local board to support local or regional plan strategies
- Cash payments for use/rental of space for the delivery of services

In-Kind Contributions: In-kind contributions can be made in lieu of cash contributions. Examples of these contributions include:

- Staff support for CareerForce or board activities beyond required participation
- Other services that leverage the expertise of the program or customize the work of the program

- Non-cash contributions are comprised of –
 - Expenditures incurred by one-stop partners on behalf of the CareerForce system; and
 - Non-cash contributions or goods or services contributed by a partner program and used by the one-stop center.

In-kind contributions must be valued consistent with 2 CFR 200.306 to ensure they are fairly evaluated and meet the partners' proportionate share. A short explanation of 2 CFR 200.306 is as follows: the value of the donated non-cash contribution must be reasonable and the lesser of fair market value or book value per accounting records; for example, if a desk that is donated is 10 years old the value of the donation can't be its purchase price as if it was brand new; an additional example is if a donation is made of staff time for a CareerForce's reception desk, then the value of that staff-time donation must be what the donated staff time would normally cost the organization which is donating their staff's time.

Dispute Resolution

If the partners are not able to reach agreement on an IFA, the local workforce development board will convene all partners and attempt to resolve the dispute. If an agreement still cannot be reached, the local workforce development board must notify DEED and the GWDB that an impasse has been reached. DEED and the GWDB will review the process and make a dispute resolution recommendation. If this is not successful and it has been more than 3 months since the expiration of the previous IFA, the SFM will take effect for that CareerForce, taking into consideration the distribution and allocation of services of all required partners within the local area.

The State Funding Mechanism (SFM)

Consistent with sec. 121(h)(1)(A)(i)(II) of WIOA, if the Local WDB, chief elected official, and one-stop partners in a local area do not reach consensus agreement on methods of sufficiently funding the costs of infrastructure of one-stop centers for a program year, the State funding mechanism is applicable to the local area for that program year.

In the State funding mechanism, the Governor, subject to limitations, determines one-stop partner contributions after consultation with the chief elected officials, Local WDBs, and the State WDB. This determination involves:

1. The application of a budget for one-stop infrastructure costs as described in regulation Sec. 20 CFR 678.735, (all regulation numbers in this section pertain to Sec. 20 CFR), based on either agreement reached in the local area negotiations or the State WDB formula outlined in regulation 678.745.
2. The determination of each local one-stop partner program's proportionate use of the one-stop delivery system and relative benefit received, consistent with the Uniform Guidance at 2 CFR part 200, including the Federal cost principles, the partner programs' authorizing laws and regulations, and other applicable legal requirements described in regulation 678.736; and
3. The calculation of required statewide program caps on contributions to infrastructure costs from one-stop partner programs in areas operating under the State funding mechanism as described in regulation 678.738.

The Governor is limited to determining the infrastructure cost contributions for some one-stop partner programs under the State funding mechanism in the following situations:

1. The Governor will not determine the contribution amounts for infrastructure funds for Native American program grantees described in regulation part 684. The appropriate portion of funds to be provided by Native American program grantees to pay for one-stop infrastructure must be determined as part of the development of the MOU described in 678.500 and specified in the MOU.
2. In States in which the policy-making authority is placed in an entity or official that is independent of the authority of the Governor with respect to the funds provided for adult education and literacy activities authorized under title II of WIOA, postsecondary career and technical education activities authorized under the Carl D. Perkins Career and Technical Education Act of 2006, or VR services authorized under title I of the Rehabilitation Act of 1973 (other than sec. 112 or part C), as amended by WIOA title IV, the determination of the amount each of the applicable partners must contribute to assist in paying the infrastructure costs of one-stop centers must be made by the official or chief officer of the entity with such authority, in consultation with the Governor.

Any duty, ability, choice, responsibility, or other action otherwise related to the determination of infrastructure costs contributions that is assigned to the Governor in regulation 678.730 through 678.745 also applies to this decision-making process performed by the official or chief officer described in paragraph in paragraph (2) above.

To initiate the State funding mechanism, a Local WDB that has not reached consensus on methods of sufficiently funding local infrastructure through the local funding mechanism as provided in regulation 678.725 must notify the Governor by the deadline established by the Governor in the IFA policy.

Once a Local WDB has informed the Governor that no consensus has been reached:

1. The Local WDB must provide the Governor with local negotiation materials in accordance with regulation 678.735(a).
2. The Governor must determine the one-stop center budget by either:
 - a. Accepting a budget previously agreed upon by partner programs in the local negotiations, in accordance with regulation 678.735(b)(1); or
 - b. Creating a budget for the one-stop center using the State WDB formula (described in regulation 678.745) in accordance with regulation 678.735(b)(3).
3. The Governor then must establish a cost allocation methodology to determine the one-stop partner programs' proportionate shares of infrastructure costs.
4. (i) Using the methodology established in this policy, and taking into consideration the factors concerning individual partner programs listed in regulation 678.737(b)(2), the Governor must determine each partner's proportionate share of the infrastructure costs, and
 - a. In accordance with regulation 678.730(c), in some instances, the Governor does not determine a partner program's proportionate share of infrastructure funding costs, in which case it must be determined by the entities named under the limitation section of the IFA policy.

5. The Governor must then calculate the statewide caps on the amounts that partner programs may be required to contribute toward infrastructure funding, according to the steps found in regulation 678.738(a)(1) through (4).
6. The Governor must ensure that the aggregate total of the infrastructure contributions according to proportionate share required of all local partner programs in local areas under the State funding mechanism do not exceed the cap for that program. If the total does not exceed the cap, the Governor must direct each one-stop partner program to pay the amount determined toward the infrastructure funding costs of the one-stop center. If the total does exceed the cap, then to determine the amount to direct each one-stop program to pay, the Governor may:
 - a. Ascertain whether the local partner or partners whose proportionate shares are calculated above the individual program caps are willing to voluntarily contribute above the capped amount to equal that program's proportionate share; or
 - b. Choose from the options provided in regulation 678.738(b)(2)(ii), including having the local area re-enter negotiations to reassess each one-stop partner's proportionate share and adjust or identify alternate sources of funding to make up the difference between the capped amount and the proportionate share of infrastructure funding of the one-stop partner.
7. If none of the solutions given in paragraphs (b)(6)(i) and (ii) of IFA regulation prove to be viable, the Governor must reassess the proportionate shares of each one-stop partner so that the aggregate amount attributable to the local partners for each program is less than that program's cap amount. Upon such reassessment, the Governor must direct each one-stop partner program to pay the reassessed amount toward the infrastructure funding costs of the one-stop center.

If a local area has reached agreement as to the infrastructure budget for the one-stop centers in the local area, it must provide this budget to the Governor. If, as a result of the agreed upon infrastructure budget, only the individual programmatic contributions to infrastructure funding based upon proportionate use of the one-stop centers and relative benefit received are at issue, the Governor may accept the budget, from which the Governor must calculate each partner's contribution consistent with the cost allocation methodologies contained in the Uniform Guidance.

The Governor may also take into consideration the extent to which the partners in the local area have agreed in determining the proportionate shares, including any agreements reached at the local level by one or more partners, as well as any other element or product of the negotiating process provided to the Governor as required by paragraph (a) of this section.

If a local area has not reached agreement as to the infrastructure budget for the one-stop centers in the local area, or if the Governor determines that the agreed upon budget does not adequately meet the needs of the local area or does not reasonably work within the confines of the local area's resources in accordance with the Governor's one-stop budget guidance (which is required to be issued by WIOA Sec. 121(h)(1)(B) and under regulation 678.705), then in accordance with regulation 678.745, the Governor must use the formula developed by the State WDB based on at least the factors required under regulation 678.745, and any associated weights to determine the local area budget.

Once the appropriate budget is determined for a local area through either method described in regulation 678.735 (by acceptance of a budget agreed upon in local negotiation or by the Governor applying the formula in regulation 678.745), the Governor must determine the appropriate cost allocation methodology to be applied to the one-stop partners in such local area, consistent with the Federal cost principles permitted under 2 CFR part 200, to fund the infrastructure budget.

The Governor must use the cost allocation methodology—as determined under Sec. 678.736—to determine each partner’s proportionate share of the infrastructure costs under the State funding mechanism, subject to considering the factors described in paragraph (b)(2) of this section.

(2) determining each partner program’s proportionate share of infrastructure costs, the Governor must take into account the costs of administration of the one-stop delivery system for purposes not related to one-stop centers for each partner (such as costs associated with maintaining the Local WDB or information technology systems), as well as the statutory requirements for each partner program, the partner program’s ability to fulfill such requirements, and all other applicable legal requirements. The Governor may also take into consideration the extent to which the partners in the local area have agreed in determining the proportionate shares, including any agreements reached at the local level by one or more partners, as well as any other materials or documents of the negotiating process, which must be provided to the Governor by the Local WDB and described in Sec. 678.735(a).

Determining Caps on Contributions

C(a) The Governor must calculate the statewide cap on the contributions for one-stop infrastructure funding required to be provided by each one-stop partner program for those local areas that have not reached agreement. The cap is the amount determined under paragraph (a)(4) of this section, which the Governor derives by:

(1) First, determining the amount resulting from applying the percentage for the corresponding one-stop partner program provided in paragraph (d) of this section to the amount of Federal funds provided to carry out the one-stop partner program in the State for the applicable fiscal year.

(2) Second, selecting a factor (or factors) that reasonably indicates the use of one-stop centers in the State, applying such factor(s) to all local areas in the State, and determining the percentage of such factor(s) applicable to the local areas that reached agreement under the local funding mechanism in the State.

(3) Third, determining the amount resulting from applying the percentage determined in paragraph (a)(2) of this section to the amount determined under paragraph (a)(1) of this section for the one-stop partner program.

(4) Fourth, determining the amount that results from subtracting the amount determined under paragraph (a)(3) of this section from the amount determined under paragraph (a)(1) of this section. The outcome of this final calculation results in the partner program’s cap.

(b)(1) The Governor must ensure that the funds required to be contributed by each partner program in the local areas in the State under the State funding mechanism, in aggregate, do not exceed the statewide cap for each program as determined under paragraph (a) of this section.

(2) If the contributions initially determined under Sec. 678.737 would exceed the applicable

cap determined under paragraph (a) of this section, the Governor may:

(i) Ascertain if the one-stop partner whose contribution would otherwise exceed the cap determined under paragraph (a) of this section will voluntarily contribute above the capped amount, so that the total contributions equal that partner's proportionate share. The one-stop partner's contribution must still be consistent with the program's authorizing laws and regulations, the Federal cost principles in 2 CFR part 200, and other applicable legal requirements; or

(ii) Direct or allow the Local WDB, chief elected officials, and one-stop partners to: re-enter negotiations, as necessary; reduce the infrastructure costs to reflect the amount of funds that are available for such costs without exceeding the cap levels; reassess the proportionate share of each one-stop partner; or identify alternative sources of financing for one-stop infrastructure funding, consistent with the requirement that each one-stop partner pay an amount that is consistent with the proportionate use of the one-stop center and relative benefit received by the partner, the program's authorizing laws and regulations, the Federal cost principles in 2 CFR part 200, and other applicable legal requirements.

(3) If applicable under paragraph (b)(2)(ii) of this section, the Local WDB, chief elected officials, and one-stop partners, after renegotiation, may come to agreement, sign an MOU, and proceed under the local funding mechanism. Such actions do not require the redetermination of the applicable caps under paragraph (a) of this section.

(4) If, after renegotiation, agreement among partners still cannot be reached or alternate financing cannot be identified, the Governor may adjust the specified allocation, in accordance with the amounts available and the limitations described in paragraph (d) of this section. In determining these adjustments, the Governor may consider information relating to the renegotiation as well as the information described in Sec. 678.735(a).

(c) Limitations. Subject to paragraph (a) of this section and in accordance with WIOA Sec., the following limitations apply to the Governor's calculations of the amount that one-stop partners in local areas that have not reached agreement under the local funding mechanism may be required under Sec. 678.736 to contribute to one-stop infrastructure funding:

Program Title	Limitation	Program Title	Limitation
Title IB (Youth, Adult, DW)	3.00%	Temporary Asst. Needy Families	1.50%
Title II - AFLA	1.50%	Sup. Nut. Assistant Program E&T	1.50%
Title III - Wagner-Peyser	3.00%	Community Serv. Block Grant	1.50%
Title IV - VRS/SSB FY16	.75%	Jobs for Veterans State Grants	1.50%
Title IV - VRS/SSB FY17	1.00%	Trade Adjustment Assistance	1.50%

Program Title	Limitation	Program Title	Limitation
Title IV – VRS/SSB FY18	1.25%	Unemployment Compensation	1.50%
Title IV – VRS/SSB FY19	1.50%	Sr. Community Ser. Emp. Program	1.50%
Carl Perkins Career and Technical Education Act	1.50%	Native American Programs	1.50%
YouthBuild	1.50%	Employment and Training Administration	1.50%
Natl. Farmworker Jobs Program	1.50%	Second Chance Act Grants	1.50%
Job Corps	1.50%		

Federal direct spending programs. For local areas that have not reached a one-stop infrastructure funding agreement by consensus, an entity administering a program funded with direct Federal spending, as defined in Sec. 250(c)(8) of the Balanced Budget and Emergency Deficit Control Act of 1985, as in effect on February 15, 2014 (2 U.S.C. 900(c)(8)), must not be required to provide more for infrastructure costs than the amount that the Governor determined.

For programs for which it is not otherwise feasible to determine the amount of Federal funding used by the program until the end of that program's operational year—because, for example, the funding available for education, employment, and training activities is included within funding for the program that may also be used for other unrelated activities—the determination of the Federal funds provided to carry out the program for a fiscal year may be determined by:

- The percentage of Federal funds available to the one-stop partner program that were used by the one-stop partner program for education, employment, and training activities in the previous fiscal year for which data are available; and
- Applying the percentage determined under paragraph (d)(1) of this section to the total amount of Federal funds available to the one-stop partner program for the fiscal year for which the determination under paragraph (a)(1) of this section applies.

In the State funding mechanism, infrastructure costs for WIOA title I programs, including Native American Programs described in part 684 of this chapter, may be paid using program funds, administrative funds, or both. Infrastructure costs for the Senior Community Service Employment Program under title V of the Older Americans Act (42 U.S.C. 3056 et seq.) may also be paid using program funds, administrative funds, or both.

In the State funding mechanism, infrastructure costs for other required one-stop partner programs (listed in Secs. 678.400 through 678.410) are limited to the program's administrative funds, as appropriate.

In the State funding mechanism, infrastructure costs for the adult education program authorized by title II of WIOA must be paid from the funds that are available for local administration and may be paid from funds made available by the State or non-Federal resources that are cash, in-kind, or third-party contributions.

In the State funding mechanism, infrastructure costs for the Carl D. Perkins Career and Technical Education Act of 2006 must be paid from funds available for local administration of postsecondary level programs and activities to eligible recipients or consortia of eligible recipients and may be paid from funds made available by the State or non-Federal resources that are cash, in-kind, or third-party contributions.

The State Formula

The State WDB must develop a formula to be used by the Governor under Sec. 678.735(b)(3) in determining the appropriate budget for the infrastructure costs of one-stop centers in the local areas that do not reach agreement under the local funding mechanism and are, therefore, subject to the State funding mechanism. The formula identifies the factors and corresponding weights for each factor that the Governor must use, which must include: the number of one-stop centers in a local area; the population served by such centers; the services provided by such centers; and any factors relating to the operations of such centers in the local area that the State WDB determines are appropriate. As indicated in Sec. 678.735(b)(1), if the local area has agreed on such a budget, the Governor may accept that budget in lieu of applying the formula factors.

The State Funding Formula will be based on the following analysis:

- The number of CareerForce Centers in the local area and total operational costs of WFCs.
- The total number and ratio of workforce participants, including disparately impacted populations included in the state plan using the WorkForce Centers.
- The availability/accessibility of services by core and required programs.

The analysis of WFC costs will be used to establish the total budgeting level for the WFC in question. The budget determined by the State Board should not vary more than 15% from the originally submitted budget for local areas with only 1 WFC, or the average cost of all WFCs within the local area. Variances above that amount may require reclassification of the WFC or adjusting of IFA contributions, based on the analysis of #2 and #3.

Appeals of the SFM

(a) The Governor must establish a process, described under sec. 121(h)(2)(E) of WIOA, for a one-stop partner administering a program described in Secs. 678.400 through 678.410 to appeal the Governor's determination regarding the one-stop partner's portion of funds to be provided for one-stop infrastructure costs. This appeal process must be described in the Unified State Plan.

(b) The appeal may be made on the ground that the Governor's determination is inconsistent with proportionate share requirements in Sec. 678.735(a), the cost contribution limitations in Sec. 678.735(b), the cost contribution caps in Sec. 678.738, consistent with the process described in the State Plan.

(c) The process must ensure prompt resolution of the appeal in order to ensure the funds are distributed in a timely manner, consistent with the requirements of Sec. 683.630 of this chapter.

(d) The one-stop partner must submit an appeal in accordance with State's deadlines for appeals specified in the guidance issued under Sec. 678.705(b)(3), or if the State has not set a deadline, within 21 days from the Governor's determination.

The IFA as Part of the MOU

The MOU, fully described in Sec. 678.500, must contain the following information whether the local areas use either the local one-stop or the State funding method:

(a) The period in which this infrastructure funding agreement is effective. This may be a different time period than the duration of the MOU.

(b) Identification of an infrastructure and shared services budget that will be periodically reconciled against actual costs incurred and adjusted accordingly to ensure that it reflects a cost allocation methodology that demonstrates how infrastructure costs are charged to each partner in proportion to its use of the one-stop center and relative benefit received, and that complies with 2 CFR part 200 (or any corresponding similar regulation or ruling).

Identification of all one-stop partners, chief elected officials, and Local WDB participating in the infrastructure funding arrangement.

Steps the Local WDB, chief elected officials, and one-stop partners used to reach consensus or an assurance that the local area followed the guidance for the State funding process.

Description of the process to be used among partners to resolve issues during the MOU duration period when consensus cannot be reached.

Description of the periodic modification and review process to ensure equitable benefit among one-stop partners.

In addition to jointly funding infrastructure costs, one-stop partners listed in Secs. 678.400 through 678.410 must use a portion of funds made available under their programs' authorizing Federal law (or fairly evaluated non-cash or third-party in-kind contributions) to pay the additional costs relating to the operation of the one-stop delivery system. These other costs must include applicable career services and may include other costs, including shared services.

For the purposes of paragraph (a) of this section, shared services' costs may include the costs of shared services that are authorized for and may be commonly provided through the one-stop partner programs 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 operating costs may also include shared costs of the Local WDB's functions.

Contributions to the additional costs related to operation of the one-stop delivery system may be cash, non-cash, or third-party in-kind contributions, consistent with how these are described in Sec. 678.720(c).

The shared costs described in paragraph (a) of this section must be allocated according to the proportion of benefit received by each of the partners, consistent with the Federal law authorizing the partner's program, and consistent with all other applicable legal requirements, including Federal cost principles in 2 CFR part 200 (or any corresponding similar regulation or ruling) requiring that costs are allowable, reasonable, necessary, and allocable.

Any shared costs agreed upon by the one-stop partners must be included in the MOU.

Non-Required Co-Located Partners

Any additional co-located partners at one stop centers are required to contribute toward infrastructure and other additional costs. The contributions from any additional partners shall be based on proportionate use and relative benefit.

Additional Costs

In addition to jointly funding infrastructure costs, one-stop partners must use a portion of funds made available under their programs' authorizing Federal law (or 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 applicable career services and may include other costs, including shared services.

Shared services costs may include the costs of shared services that are authorized for and may be commonly provided through the one-stop partner programs 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 operating costs may also include shared costs of the Local WDB's functions. Contributions to the additional costs related to operation of the one-stop delivery system may be cash, non-cash, or third-party in-kind contributions.

The shared costs must be allocated according to the proportionate use and relative benefit received by each of the partners, consistent with the Federal law authorizing the partner's program, and consistent with all other applicable legal requirements. Any shared costs agreed upon by the one-stop partners must be included in the MOU.

WIOA Title II has a unique state-created system database. The state Adult Education (ABE) database is named SiD (Student information database) and has been developed to serve as a program management resource as well as a federal reporting database. Participant information, class schedules, program information, test scores, diplomas earned, measurable skills gains, and additional information are entered in SiD. Data from high school equivalency testing records is imported into SiD. Specialized reports are produced for public resources and partner entities, including participation reports for TANF counselors, program details for the Minnesota Adult Literacy Hotline, provider information for the Employment and Training Provider List, and data extracts for federal reporting.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (FOR EXAMPLE, 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 AND ANY ADDITIONAL GUIDANCE FOR ONE-STOP PARTNER CONTRIBUTIONS.

Under the Workforce Investment Act, DEED operated as the lead on writing, soliciting feedback, publishing, and enforcing policies. Under the Workforce Innovation and Opportunity Act, DEED still performs many of these duties, but engages other partner state agencies to ensure continuity and shared awareness in coordination with the GWDB.

DEED plans to publish policies that address cross-agency program co-enrollment. In practice, most core programs use Workforce One, the state's client management information system, to encourage co-enrollment across programs. The allowable co-enrollment in this system serves as Minnesota's policy. DEED staff will follow-up to publish formal guidance on program co-enrollment. Currently there is co-enrollment activity between several federal programs with state programs. A prime example of how co-enrollment is considered involves dislocated workers. Depending upon the scenario, a dislocated worker may have options for federal and state dislocated worker support, such as a TAA grant, depending upon the type and category of lay-off that has occurred.

Universal intake processes have some layers in Minnesota. All individuals who access job seeker support services via CareerForce and through Minnesota's labor exchange system are accessing programs funded through Wagner-Peyser's Employment Service Program. Many of those customers seek deeper services with counselors that require program enrollment. In those cases, the majority of WIOA enrolled customers are co-enrolled with Wagner-Peyser Employment Service Program, but the opposite is not true. Service providers in Minnesota will continue to work to make the program enrollment process as seamless as possible to the customer.

Minnesota fulfills its obligation to provide guidance on infrastructure cost allocation procedures to be reflected within the memorandums of understanding through an existing policy put in place in 2018. DEED is currently facilitating discussion on a new IFA policy and procedure that will improve the process for the one-stop system and all its required partners. Additionally, DEED is working with across one-stop system partners to support negotiations for the upcoming round of IFAs and MOUs.

Minnesota adheres to all current rules and regulations pertaining to the selection of one-stop operators as dictated by WIOA. Minnesota's one-stop system, the "CareerForce" system, has 51 comprehensive and affiliate locations. The infrastructure costs as well as the additional costs of operating these locations are allocated based on the infrastructure funding agreements attached to the memorandums of understanding in each of Minnesota's 16 local workforce development areas.

Infrastructure Funding Agreements (IFAs)

As Minnesota is in the process of updating the IFA policy, what follows is an outline of current guidance provided to the system on Infrastructure Funding Agreements.

IFAs must be submitted at least every 3 years for each CareerForce Center (CFC) to ensure that all required CareerForce partners are equitably contributing to the costs of the CareerForce System, as defined in WIOA. The IFA will be included in every Local Workforce Development Area's (LWDA) Memorandum of Understanding (MOU). In the wake of changing guidance on these agreements, in Minnesota in coordination with guidance received from the United States Department of Labor (DOL), we guide the IFA process in the following ways.

An IFA must be submitted at least every 3 years for each CareerForce Center (CFC) to ensure that all required CareerForce partners are equitably contributing to the costs of the CareerForce System. The IFA recognizes the shared resources of key partners delivering workforce

development and related services. Mutual consent and cooperation of all partners is an essential part of the IFA process. IFAs are guided by the Coordination Unit of DEED's Administrative and Financial Services Division.

The IFA must be completed and submitted to DEED for the CFC prior to the expiration date of the current IFA. Participants in an IFA can request the IFA to be amended if a material change occurs during the covered period.

If the IFA is not submitted and finalized in a timely manner as described above, the existing IFA will remain in place until a new IFA is agreed to. If the local board reports to DEED and the GWDB that an impasse cannot be resolved, the State Funding Mechanism (SFM) replaces any operational cost sharing agreement in place at the CareerForce Center.

WIOA as well as federal Department of Labor (DOL) and Minnesota Management and Budget (MMB) guidelines require that all actual and required partners in a CFC share benefitting expenses associated with infrastructure. Minnesota's IFA policy recognizes the principles of proportionate use and relative benefit and applies it to all required WIOA titles, with different principles for co-located and non-co-located required partners. This policy details the approach and process for both scenarios. WIOA requires the following programs to contribute to infrastructure costs of the CareerForce system:

1. WIOA Title I - Adult, Dislocated Worker, Youth and YouthBuild
2. WIOA Title II – Adult Education and Family Literacy
3. WIOA Title III – Wagner-Peyser Employment Service Program
4. WIOA Title IV – Vocational Rehabilitation Services/State Services for the Blind
5. National Farmworker Jobs Program
6. OAA, (Older Americans Act) Title V – SCSEP (Senior Community Service Employment Program)
7. Temporary Assistance for Needy Families
8. Supplemental Nutrition Assistance Program E&T
9. Career & Technical Education Programs (post-secondary)
10. Trade Adjustment Assistance
11. Jobs for Veterans State Grants
12. Community Services Block Grant E&T
13. Housing & Urban Development E&T
14. Unemployment Insurance
15. Job Corps
16. Native American Programs (contribution is optional for Native American Programs. Additionally, they must be part of the MOU, but their participation in the IFA is optional)

Local Funding Mechanism

Co-Located Partners Procedure for Completing IFAs

CareerForce partners are required to follow this procedure in completing and submitting their IFAs:

- DEED can provide necessary customer data from Workforce One (WF1) and the labor exchange data, as well as the previous approved IFA.
- Local partners will negotiate costs with local partners, obtain all necessary local signatures on the IFA, and send the IFA either electronically or physically to DEED no later than the last week of May prior to the IFA's effective program year date.
- DEED will obtain necessary central DEED signatures on the IFAs prior to its effective date. If central DEED authorities disagree with any aspect of an IFA and refuse to sign it, DEED will notify local partners of this no later than one week after the IFA has been submitted to DEED in order to allow adequate time for an agreement to be reached.

DEED will keep central records of all IFAs.

Career Lab Costs

This includes the associated costs of running a Career Lab resource room supported by the State of Minnesota. This includes Wide Area Network (WAN) Internet costs; public-use computers; public-use printer, scanner, fax machines; and the Cybrarian software used to secure and track activity. The State Funding Mechanism appeals process per 121(h)(2)(D) is described in State Policies and Guidance, however, the responsibility for IFAs has transitioned to DEED's Administration and Financial Services Division and current policies are under review.

Other Sub-Lease or Space Rental Agreements: Note on situations of special space rental not reflected within the IFA- if any organization that is allocated space within an IFA wishes to rent some of their space to any other organization outside of the IFA, they may do so. The particulars of this agreement don't need to be tracked in the IFA if the space is accounted for within the IFA and allocated to the organization responsible for it.

Security and/or Site Management Costs

Some CFCs allocate "Site Management" costs. Site Managers take on the business of the facility they are located in and handle things such as communication with landlords on matters of snow removal, ordering supplies, and/or keeping usage logs of conference room space up to date. These must be considered as in-kind contributions of time.

Some CareerForce Centers allocate "Security" costs such as the cost of security guards on site. Other security costs that could be allocated according to the above formula instead of directly to one program could include examples like the following: a new lock system in the front entrance of the facility; security cameras throughout the facility; a panic button and announcement system.

Methodologies Described

Dedicated Space. Dedicated space is space that is used exclusively by a CareerForce partner. Examples could include office, meeting or storage space. The partner agrees to pay for their dedicated space 100% of the time, whether occupied or not, within the lease period.

Usage Logs/Metering. Usage logs are records of how space or items were used. Examples could include a sign-up sheet for shared meeting space. Partners agree to pay their percentage of total usage for the cost of the item being tracked in this manner.

FTEs. The number of full-time equivalents on site. Staff with office space at multiple sites may not be counted as more than one FTE, with fractions totaling one FTE being allocated across the multiple sites. Vacant or unfilled positions must be included in the FTE count.

Workforce One Data (WF1). Workforce One participant enrollments can be used for allocating costs of operations. However, the breakdown of these costs are still subject to local negotiation of partners involved.

Exemptions – Program exemptions from allocation of certain costs are allowed if the program can document/attest to the fact that these customers do not receive direct services out of their assigned (by WF1) CareerForce. Exemptions must be approved by DEED and included in this section of the IFA policy. Current exemptions include:

- Youth participants from Title IB and Title IV
- MFIP participants receiving services in non-CFC counties
- Title VII program of State Services for the Blind, (SSB"u" only, not SSB"w"), for visually impaired individuals

Career Lab Costs. Career Lab costs are negotiated by CareerForce system partners at the local and regional level. Quantitative metrics should be used when appropriate for allocating costs of a Career Lab. If this issue becomes an impasse issue for the local board or rises to the State Board for resolution.

Total Dedicated and Shared Space. The sum of dedicated and shared space indicated on an IFA.

Reconciliation

If usage data or other changes that affect any allocations of the IFA deviate more than 5% during a biannual review, this is a material change and adjusting reconciliation payments will be required. If the review identifies material changes during consecutive bi-annual reviews a new IFA must be completed at a minimum on a quarterly basis and will be coordinated by DEED.

If all local partners agree that a new IFA is not needed or desired, then they can inform DEED of this decision and the current IFA will stay in effect for another year. At the end of that year, one or more partners may again request to negotiate a new IFA. If all partners agree, the existing IFA may be retained through the original ending date.

IFA Amendments

If a substantial change, (with "substantial change" generally interpreted as a more than 5% deviation of any allocation percentages within the IFA), as interpreted by local management, occurs within a CareerForce Center local partners can request that the IFA be amended to reflect the actual allocation of infrastructure costs more accurately in the location. Examples of how this could happen include but are not limited to a number of staff either enter or exit the location; the size of the leased space decreases or increases; many computers that use MN.IT internet are installed at the location.

Non-Co-Located Partners Procedure for Completing IFAs

A non-co-located partner is defined as a partner who does not have a physical presence at one CareerForce Center per local area. Non-Co-Located Partners are required to participate in the costs of at least one CareerForce Center in each local area. Programs that have multiple

providers within a local area are viewed as one program, requiring that only a single contribution be agreed to by the state agency that oversees that program.

Local Boards are encouraged to work with non-co-located partners to assess an appropriate contribution to the IFA, based on proportionate benefit of the use of the CareerForce system. These partners should produce some form of documentation to share with the board to make this determination.

If this can't be achieved, it is recommended that a process be applied that assumes proportionate benefit can be assessed based on the distribution of their program eligible individuals within each of the local areas and the recognition of total financial contributions equaling 1.5% of the State's total federal allocation for that program based on the current Federal fiscal year funding for the program. The following table illustrates this process to establish the required contribution within each local area.

Federal Title	Title's Total Federal Allocation	1.5% IFA Contribution
"X"	\$1,000,000	\$15,000

Eligible Program Population by Local Workforce Development Area

#1	#2	#3	#4	#5	#6	#7	#8	#9	#10
20%	3%	15%	10%	15%	10%	10%	5%	10%	2%
\$3,000	\$450	\$2,250	\$1,500	\$2,250	\$1,500	\$1,500	\$750	\$1,500	\$300

These contributions can be achieved in two ways – cash contributions or in-kind contributions.

Cash Contributions: Cash contributions must be documented and included in the IFA. Two examples of cash contributions are:

- Cash contributions to the local board to support local or regional plan strategies
- Cash payments for use/rental of space for the delivery of services

In-Kind Contributions: In-kind contributions can be made in lieu of cash contributions. Examples of these contributions include:

- Staff support for CareerForce or board activities beyond required participation
- Other services that leverage the expertise of the program or customize the work of the program
- Non-cash contributions are comprised of –
 - Expenditures incurred by one-stop partners on behalf of the CareerForce system; and

- Non-cash contributions or goods or services contributed by a partner program and used by the one-stop center.

In-kind contributions must be valued consistent with 2 CFR 200.306 to ensure they are fairly evaluated and meet the partners' proportionate share. A short explanation of 2 CFR 200.306 is as follows: the value of the donated non-cash contribution must be reasonable and the lesser of fair market value or book value per accounting records; for example, if a desk that is donated is 10 years old the value of the donation can't be its purchase price as if it was brand new; an additional example is if a donation is made of staff time for a CareerForce's reception desk, then the value of that staff-time donation must be what the donated staff time would normally cost the organization which is donating their staff's time.

Dispute Resolution

If the partners are not able to reach agreement on an IFA, the local workforce development board will convene all partners and attempt to resolve the dispute. If an agreement still cannot be reached, the local workforce development board must notify DEED and the GWDB that an impasse has been reached. DEED and the GWDB will review the process and make a dispute resolution recommendation. If this is not successful and it has been more than 3 months since the expiration of the previous IFA, the SFM will take effect for that CareerForce, taking into consideration the distribution and allocation of services of all required partners within the local area.

The State Funding Mechanism (SFM)

Consistent with sec. 121(h)(1)(A)(i)(II) of WIOA, if the Local WDB, chief elected official, and one-stop partners in a local area do not reach consensus agreement on methods of sufficiently funding the costs of infrastructure of one-stop centers for a program year, the State funding mechanism is applicable to the local area for that program year.

In the State funding mechanism, the Governor, subject to limitations, determines one-stop partner contributions after consultation with the chief elected officials, Local WDBs, and the State WDB. This determination involves:

1. The application of a budget for one-stop infrastructure costs as described in regulation Sec. 20 CFR 678.735, (all regulation numbers in this section pertain to Sec. 20 CFR), based on either agreement reached in the local area negotiations or the State WDB formula outlined in regulation 678.745.
2. The determination of each local one-stop partner program's proportionate use of the one-stop delivery system and relative benefit received, consistent with the Uniform Guidance at 2 CFR part 200, including the Federal cost principles, the partner programs' authorizing laws and regulations, and other applicable legal requirements described in regulation 678.736; and
3. The calculation of required statewide program caps on contributions to infrastructure costs from one-stop partner programs in areas operating under the State funding mechanism as described in regulation 678.738.

The Governor is limited to determining the infrastructure cost contributions for some one-stop partner programs under the State funding mechanism in the following situations:

1. The Governor will not determine the contribution amounts for infrastructure funds for Native American program grantees described in regulation part 684. The appropriate portion of funds to be provided by Native American program grantees to pay for one-

stop infrastructure must be determined as part of the development of the MOU described in 678.500 and specified in the MOU.

2. In States in which the policy-making authority is placed in an entity or official that is independent of the authority of the Governor with respect to the funds provided for adult education and literacy activities authorized under title II of WIOA, postsecondary career and technical education activities authorized under the Carl D. Perkins Career and Technical Education Act of 2006, or VR services authorized under title I of the Rehabilitation Act of 1973 (other than sec. 112 or part C), as amended by WIOA title IV, the determination of the amount each of the applicable partners must contribute to assist in paying the infrastructure costs of one-stop centers must be made by the official or chief officer of the entity with such authority, in consultation with the Governor.

Any duty, ability, choice, responsibility, or other action otherwise related to the determination of infrastructure costs contributions that is assigned to the Governor in regulation 678.730 through 678.745 also applies to this decision-making process performed by the official or chief officer described in paragraph (2) above.

To initiate the State funding mechanism, a Local WDB that has not reached consensus on methods of sufficiently funding local infrastructure through the local funding mechanism as provided in regulation 678.725 must notify the Governor by the deadline established by the Governor in the IFA policy.

Once a Local WDB has informed the Governor that no consensus has been reached:

1. The Local WDB must provide the Governor with local negotiation materials in accordance with regulation 678.735(a).
2. The Governor must determine the one-stop center budget by either:
 - a. Accepting a budget previously agreed upon by partner programs in the local negotiations, in accordance with regulation 678.735(b)(1); or
 - b. Creating a budget for the one-stop center using the State WDB formula (described in regulation 678.745) in accordance with regulation 678.735(b)(3).
3. The Governor then must establish a cost allocation methodology to determine the one-stop partner programs' proportionate shares of infrastructure costs.
4. (i) Using the methodology established in this policy, and taking into consideration the factors concerning individual partner programs listed in regulation 678.737(b)(2), the Governor must determine each partner's proportionate share of the infrastructure costs, and
 - a. In accordance with regulation 678.730(c), in some instances, the Governor does not determine a partner program's proportionate share of infrastructure funding costs, in which case it must be determined by the entities named under the limitation section of the IFA policy.
5. The Governor must then calculate the statewide caps on the amounts that partner programs may be required to contribute toward infrastructure funding, according to the steps found in regulation 678.738(a)(1) through (4).
6. The Governor must ensure that the aggregate total of the infrastructure contributions according to proportionate share required of all local partner programs in local areas

under the State funding mechanism do not exceed the cap for that program. If the total does not exceed the cap, the Governor must direct each one-stop partner program to pay the amount determined toward the infrastructure funding costs of the one-stop center. If the total does exceed the cap, then to determine the amount to direct each one-stop program to pay, the Governor may:

- a. Ascertain whether the local partner or partners whose proportionate shares are calculated above the individual program caps are willing to voluntarily contribute above the capped amount to equal that program's proportionate share; or
 - b. Choose from the options provided in regulation 678.738(b)(2)(ii), including having the local area re-enter negotiations to reassess each one-stop partner's proportionate share and adjust or identify alternate sources of funding to make up the difference between the capped amount and the proportionate share of infrastructure funding of the one-stop partner.
7. If none of the solutions given in paragraphs (b)(6)(i) and (ii) of IFA regulation prove to be viable, the Governor must reassess the proportionate shares of each one-stop partner so that the aggregate amount attributable to the local partners for each program is less than that program's cap amount. Upon such reassessment, the Governor must direct each one-stop partner program to pay the reassessed amount toward the infrastructure funding costs of the one-stop center.

If a local area has reached agreement as to the infrastructure budget for the one-stop centers in the local area, it must provide this budget to the Governor. If, as a result of the agreed upon infrastructure budget, only the individual programmatic contributions to infrastructure funding based upon proportionate use of the one-stop centers and relative benefit received are at issue, the Governor may accept the budget, from which the Governor must calculate each partner's contribution consistent with the cost allocation methodologies contained in the Uniform Guidance.

The Governor may also take into consideration the extent to which the partners in the local area have agreed in determining the proportionate shares, including any agreements reached at the local level by one or more partners, as well as any other element or product of the negotiating process provided to the Governor as required by paragraph (a) of this section.

If a local area has not reached agreement as to the infrastructure budget for the one-stop centers in the local area, or if the Governor determines that the agreed upon budget does not adequately meet the needs of the local area or does not reasonably work within the confines of the local area's resources in accordance with the Governor's one-stop budget guidance (which is required to be issued by WIOA Sec. 121(h)(1)(B) and under regulation 678.705), then in accordance with regulation 678.745, the Governor must use the formula developed by the State WDB based on at least the factors required under regulation 678.745, and any associated weights to determine the local area budget.

Once the appropriate budget is determined for a local area through either method described in regulation 678.735 (by acceptance of a budget agreed upon in local negotiation or by the Governor applying the formula in regulation 678.745), the Governor must determine the appropriate cost allocation methodology to be applied to the one-stop partners in such local area, consistent with the Federal cost principles permitted under 2 CFR part 200, to fund the infrastructure budget.

The Governor must use the cost allocation methodology—as determined under Sec. 678.736—to determine each partner's proportionate share of the infrastructure costs under the State funding mechanism, subject to considering the factors described in paragraph (b)(2) of this section.

(2) determining each partner program's proportionate share of infrastructure costs, the Governor must take into account the costs of administration of the one-stop delivery system for purposes not related to one-stop centers for each partner (such as costs associated with maintaining the Local WDB or information technology systems), as well as the statutory requirements for each partner program, the partner program's ability to fulfill such requirements, and all other applicable legal requirements. The Governor may also take into consideration the extent to which the partners in the local area have agreed in determining the proportionate shares, including any agreements reached at the local level by one or more partners, as well as any other materials or documents of the negotiating process, which must be provided to the Governor by the Local WDB and described in Sec. 678.735(a).

Determining Caps on Contributions

C(a) The Governor must calculate the statewide cap on the contributions for one-stop infrastructure funding required to be provided by each one-stop partner program for those local areas that have not reached agreement. The cap is the amount determined under paragraph (a)(4) of this section, which the Governor derives by:

(1) First, determining the amount resulting from applying the percentage for the corresponding one-stop partner program provided in paragraph (d) of this section to the amount of Federal funds provided to carry out the one-stop partner program in the State for the applicable fiscal year.

(2) Second, selecting a factor (or factors) that reasonably indicates the use of one-stop centers in the State, applying such factor(s) to all local areas in the State, and determining the percentage of such factor(s) applicable to the local areas that reached agreement under the local funding mechanism in the State.

(3) Third, determining the amount resulting from applying the percentage determined in paragraph (a)(2) of this section to the amount determined under paragraph (a)(1) of this section for the one-stop partner program.

(4) Fourth, determining the amount that results from subtracting the amount determined under paragraph (a)(3) of this section from the amount determined under paragraph (a)(1) of this section. The outcome of this final calculation results in the partner program's cap.

(b)(1) The Governor must ensure that the funds required to be contributed by each partner program in the local areas in the State under the State funding mechanism, in aggregate, do not exceed the statewide cap for each program as determined under paragraph (a) of this section.

(2) If the contributions initially determined under Sec. 678.737 would exceed the applicable cap determined under paragraph (a) of this section, the Governor may:

(i) Ascertain if the one-stop partner whose contribution would otherwise exceed the cap determined under paragraph (a) of this section will voluntarily contribute above the capped amount, so that the total contributions equal that partner's proportionate share. The one-stop partner's contribution must still be consistent with the program's authorizing laws and regulations, the Federal cost principles in 2 CFR part 200, and other applicable legal

requirements; or

(ii) Direct or allow the Local WDB, chief elected officials, and one-stop partners to: re-enter negotiations, as necessary; reduce the infrastructure costs to reflect the amount of funds that are available for such costs without exceeding the cap levels; reassess the proportionate share of each one-stop partner; or identify alternative sources of financing for one-stop infrastructure funding, consistent with the requirement that each one-stop partner pay an amount that is consistent with the proportionate use of the one-stop center and relative benefit received by the partner, the program's authorizing laws and regulations, the Federal cost principles in 2 CFR part 200, and other applicable legal requirements.

(3) If applicable under paragraph (b)(2)(ii) of this section, the Local WDB, chief elected officials, and one-stop partners, after renegotiation, may come to agreement, sign an MOU, and proceed under the local funding mechanism. Such actions do not require the redetermination of the applicable caps under paragraph (a) of this section.

(4) If, after renegotiation, agreement among partners still cannot be reached or alternate financing cannot be identified, the Governor may adjust the specified allocation, in accordance with the amounts available and the limitations described in paragraph (d) of this section. In determining these adjustments, the Governor may consider information relating to the renegotiation as well as the information described in Sec. 678.735(a).

(c) Limitations. Subject to paragraph (a) of this section and in accordance with WIOA Sec., the following limitations apply to the Governor's calculations of the amount that one-stop partners in local areas that have not reached agreement under the local funding mechanism may be required under Sec. 678.736 to contribute to one-stop infrastructure funding:

Program Title	Limitation	Program Title	Limitation
Title IB (Youth, Adult, DW)	3.00%	Temporary Asst. Needy Families	1.50%
Title II - AFLA	1.50%	Sup. Nut. Assistant Program E&T	1.50%
Title III - Wagner-Peyser	3.00%	Community Serv. Block Grant	1.50%
Title IV - VRS/SSB FY16	.75%	Jobs for Veterans State Grants	1.50%
Title IV - VRS/SSB FY17	1.00%	Trade Adjustment Assistance	1.50%
Title IV - VRS/SSB FY18	1.25%	Unemployment Compensation	1.50%
Title IV - VRS/SSB FY19	1.50%	Sr. Community Ser. Emp. Program	1.50%

Program Title	Limitation	Program Title	Limitation
Carl Perkins Career and Technical Education Act	1.50%	Native American Programs	1.50%
YouthBuild	1.50%	Employment and Training Administration	1.50%
Natl. Farmworker Jobs Program	1.50%	Second Chance Act Grants	1.50%
Job Corps	1.50%		

Federal direct spending programs. For local areas that have not reached a one-stop infrastructure funding agreement by consensus, an entity administering a program funded with direct Federal spending, as defined in Sec. 250(c)(8) of the Balanced Budget and Emergency Deficit Control Act of 1985, as in effect on February 15, 2014 (2 U.S.C. 900(c)(8)), must not be required to provide more for infrastructure costs than the amount that the Governor determined.

For programs for which it is not otherwise feasible to determine the amount of Federal funding used by the program until the end of that program's operational year—because, for example, the funding available for education, employment, and training activities is included within funding for the program that may also be used for other unrelated activities—the determination of the Federal funds provided to carry out the program for a fiscal year may be determined by:

- The percentage of Federal funds available to the one-stop partner program that were used by the one-stop partner program for education, employment, and training activities in the previous fiscal year for which data are available; and
- Applying the percentage determined under paragraph (d)(1) of this section to the total amount of Federal funds available to the one-stop partner program for the fiscal year for which the determination under paragraph (a)(1) of this section applies.

In the State funding mechanism, infrastructure costs for WIOA title I programs, including Native American Programs described in part 684 of this chapter, may be paid using program funds, administrative funds, or both. Infrastructure costs for the Senior Community Service Employment Program under title V of the Older Americans Act (42 U.S.C. 3056 et seq.) may also be paid using program funds, administrative funds, or both.

In the State funding mechanism, infrastructure costs for other required one-stop partner programs (listed in Secs. 678.400 through 678.410) are limited to the program's administrative funds, as appropriate.

In the State funding mechanism, infrastructure costs for the adult education program authorized by title II of WIOA must be paid from the funds that are available for local administration and may be paid from funds made available by the State or non-Federal resources that are cash, in-kind, or third-party contributions.

In the State funding mechanism, infrastructure costs for the Carl D. Perkins Career and

Technical Education Act of 2006 must be paid from funds available for local administration of postsecondary level programs and activities to eligible recipients or consortia of eligible recipients and may be paid from funds made available by the State or non-Federal resources that are cash, in-kind, or third-party contributions.

The State Formula

The State WDB must develop a formula to be used by the Governor under Sec. 678.735(b)(3) in determining the appropriate budget for the infrastructure costs of one-stop centers in the local areas that do not reach agreement under the local funding mechanism and are, therefore, subject to the State funding mechanism. The formula identifies the factors and corresponding weights for each factor that the Governor must use, which must include: the number of one-stop centers in a local area; the population served by such centers; the services provided by such centers; and any factors relating to the operations of such centers in the local area that the State WDB determines are appropriate. As indicated in Sec. 678.735(b)(1), if the local area has agreed on such a budget, the Governor may accept that budget in lieu of applying the formula factors.

The State Funding Formula will be based on the following analysis:

- The number of CareerForce Centers in the local area and total operational costs of WFCs.
- The total number and ratio of workforce participants, including disparately impacted populations included in the state plan using the WorkForce Centers.
- The availability/accessibility of services by core and required programs.

The analysis of WFC costs will be used to establish the total budgeting level for the WFC in question. The budget determined by the State Board should not vary more than 15% from the originally submitted budget for local areas with only 1 WFC, or the average cost of all WFCs within the local area. Variances above that amount may require reclassification of the WFC or adjusting of IFA contributions, based on the analysis of #2 and #3.

Appeals of the SFM

(a) The Governor must establish a process, described under sec. 121(h)(2)(E) of WIOA, for a one-stop partner administering a program described in Secs. 678.400 through 678.410 to appeal the Governor's determination regarding the one-stop partner's portion of funds to be provided for one-stop infrastructure costs. This appeal process must be described in the Unified State Plan.

(b) The appeal may be made on the ground that the Governor's determination is inconsistent with proportionate share requirements in Sec. 678.735(a), the cost contribution limitations in Sec. 678.735(b), the cost contribution caps in Sec. 678.738, consistent with the process described in the State Plan.

(c) The process must ensure prompt resolution of the appeal in order to ensure the funds are distributed in a timely manner, consistent with the requirements of Sec. 683.630 of this chapter.

(d) The one-stop partner must submit an appeal in accordance with State's deadlines for appeals specified in the guidance issued under Sec. 678.705(b)(3), or if the State has not set a deadline, within 21 days from the Governor's determination.

The IFA as Part of the MOU

The MOU, fully described in Sec. 678.500, must contain the following information whether the local areas use either the local one-stop or the State funding method:

(a) The period in which this infrastructure funding agreement is effective. This may be a different time period than the duration of the MOU.

(b) Identification of an infrastructure and shared services budget that will be periodically reconciled against actual costs incurred and adjusted accordingly to ensure that it reflects a cost allocation methodology that demonstrates how infrastructure costs are charged to each partner in proportion to its use of the one-stop center and relative benefit received, and that complies with 2 CFR part 200 (or any corresponding similar regulation or ruling).

Identification of all one-stop partners, chief elected officials, and Local WDB participating in the infrastructure funding arrangement.

Steps the Local WDB, chief elected officials, and one-stop partners used to reach consensus or an assurance that the local area followed the guidance for the State funding process.

Description of the process to be used among partners to resolve issues during the MOU duration period when consensus cannot be reached.

Description of the periodic modification and review process to ensure equitable benefit among one-stop partners.

In addition to jointly funding infrastructure costs, one-stop partners listed in Secs. 678.400 through 678.410 must use a portion of funds made available under their programs' authorizing Federal law (or fairly evaluated non-cash or third-party in-kind contributions) to pay the additional costs relating to the operation of the one-stop delivery system. These other costs must include applicable career services and may include other costs, including shared services.

For the purposes of paragraph (a) of this section, shared services' costs may include the costs of shared services that are authorized for and may be commonly provided through the one-stop partner programs 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 operating costs may also include shared costs of the Local WDB's functions.

Contributions to the additional costs related to operation of the one-stop delivery system may be cash, non-cash, or third-party in-kind contributions, consistent with how these are described in Sec. 678.720(c).

The shared costs described in paragraph (a) of this section must be allocated according to the proportion of benefit received by each of the partners, consistent with the Federal law authorizing the partner's program, and consistent with all other applicable legal requirements, including Federal cost principles in 2 CFR part 200 (or any corresponding similar regulation or ruling) requiring that costs are allowable, reasonable, necessary, and allocable.

Any shared costs agreed upon by the one-stop partners must be included in the MOU.

Non-Required Co-Located Partners

Any additional co-located partners at one stop centers are required to contribute toward infrastructure and other additional costs. The contributions from any additional partners shall be based on proportionate use and relative benefit.

Additional Costs

In addition to jointly funding infrastructure costs, one-stop partners must use a portion of funds made available under their programs' authorizing Federal law (or 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 applicable career services and may include other costs, including shared services.

Shared services costs may include the costs of shared services that are authorized for and may be commonly provided through the one-stop partner programs 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 operating costs may also include shared costs of the Local WDB's functions. Contributions to the additional costs related to operation of the one-stop delivery system may be cash, non-cash, or third-party in-kind contributions.

The shared costs must be allocated according to the proportionate use and relative benefit received by each of the partners, consistent with the Federal law authorizing the partner's program, and consistent with all other applicable legal requirements. Any shared costs agreed upon by the one-stop partners must be included in the MOU.

While Title II (Adult Education) does not typically enter data in Workforce One, providers do collaborate and co-enroll participants through data agreements, shared intake forms, and co-locations with workforce development partners. All of Title II's programming that is publicly available is accessible through the Minnesota Adult Literacy Hotline (<http://hotline.mnabe.org> and 1-800-222-1990). This hotline includes program contact information, locations, and instructional schedules and is used by programs, partners, and potential students to help determine which sites have the best program options depending on the individual's needs and goals.

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.

1. 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 WIOA State Plan programs are administered across four state agencies including the Department of Employment and Economic Development (DEED), Minnesota Department of Education (MDE), Minnesota State Colleges and Universities, and Minnesota Department of Human Services (DHS). The following list provides details for the programs administered by each agency.

Agency	Program
Department of Employment and Economic Development (DEED)	Title I: Adult, Dislocated Worker, Youth, Migrant and Seasonal Farm Worker Program Title III: Wagner-Peyser (Employment Services), Title IV - Vocational Rehabilitation - State Services for the Blind, Trade Adjustment Assistance for Worker, Program; Jobs for Veterans State Grants; Senior Community Service Employment Program (SCSEP)
Minnesota Department of Education (MDE)	Title II - Adult Education and Family Literacy Act
Minnesota State Colleges and Universities	Career and Technical Education - Perkins V
Minnesota Department of Human Services (DHS) Children, Youth, and Families (DCYF)	Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program Employment & Training Programs (SNAP E&T)

DEED

DEED is led by Commissioner Matt Varilek, ~~and four~~ [three](#) Deputy Commissioners, [three Assistant Commissioners, a Communication's Director, Government Relations Director, and Executive Director of the Governor's Workforce Development Board](#). Deputy Commissioner Marc Majors leads the Workforce Development division which are WIOA Titles I, III, TAA, Trade Adjustment Assistance for Worker, Program, Jobs for Veterans State Grants, and the Senior Community Service Employment Program (SCSEP) [and Assistant Commissioner Abdiwahab Mohamed oversees the Office of New Americans which sits within the Workforce Development Division](#). Within the titles of WIOA, separate directors oversee each of the WIOA titles. ~~Katie McClelland serves at the Director of the GWDB and also reports to Deputy Commissioner Majors.~~

Deputy Commissioner Evan Rowe leads the Workforce Services and Transformation division which oversees WIOA Title IV, including Vocational Rehabilitation Services and State Services for the Blind as well as Unemployment Insurance. Each of these programs has its individual director overseeing those activities.

Deputy Commissioner Kevin McKinnon leads the Economic Development division includes the Labor Market Information office and Business Development office which houses the Workforce Strategy Consultants.

~~Deputy Assistant~~ Commissioner ~~Elizabeth Froese~~ ~~Emily Lefholz~~ leads the ~~External Relations division~~ ~~Operations division~~ which includes Communications ~~led by Alicia Cordes~~, the Office of Public Engagement, ~~Government Relations led by Deven Bowdry~~, ~~Tribal Relations~~, and the Governor's Workforce Development Board led by Executive Director Katie McClelland.

~~Assistant Commissioner Katie Knutson leads the Operations division which includes Administrative and Financial Services~~ and the Diversity and Equal Opportunity Office. Information technology needs are supported by the state agency known as MN-IT@DEED.

At the local level, Minnesota has 16 local workforce development areas overseen by Local Area Workforce Development Boards. In Greater Minnesota, the term used to describe areas of the state outside of the seven-county metropolitan area that includes Minneapolis and St. Paul, there are five regions that combine the efforts of two local area boards for regional planning purposes. The Twin Cities metropolitan area has six local workforce development areas and combines the efforts of six Local Area Boards for regional planning purposes. Additionally, the Greater Metropolitan Workforce Council works closely with local boards and staff in the metropolitan area to develop regional goals, projects, initiatives, and to provide support for WIOA regional planning efforts.

MDE

MDE is led by Commissioner Willie Jett, Deputy Commissioner Stephanie Graff, a Chief Operating Officer and four Assistant Commissioners. Assistant Commissioner Angela Mansfield leads the Office of Educational Opportunity which oversees Title II, Adult Education and Literacy, and includes the Student Access and Opportunity, Career and College Success which leads the secondary-level career and technical education programs, Educator Workforce and Development Center, Data Practices and Analytics, and COMPASS offices.

Minnesota State Colleges and Universities (Minnesota State)

Minnesota State is led by Chancellor Scott Olson. Shannon Bryant is the Executive Director of the Workforce and Economic Development Division, which houses the state's career and technical education program at the secondary level and the implementation of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) to advance career and technical education for all learners.

DHSDCYF

~~DHS-DCYF~~ is led by Commissioner ~~Tikki Brown~~ ~~Jodi Harpstead~~ and ~~five-four~~ Assistant Commissioners, including Assistant Commissioner ~~Tikki Brown~~ ~~Shaneen Moore~~ who oversees the Economic Assistance and Employment Supports Division which houses TANF and SNAP E&T.

B. STATE BOARD. PROVIDE A DESCRIPTION OF THE STATE BOARD ACTIVITIES THAT WILL ASSIST STATE BOARD MEMBERS AND STAFF IN CARRYING OUT STATE BOARD FUNCTIONS EFFECTIVELY. ALSO, PROVIDE A MEMBERSHIP ROSTER FOR THE STATE BOARD CONSISTENT WITH 20 CFR 679.110-120, INCLUDING MEMBERS' ORGANIZATIONAL AFFILIATIONS AND POSITION TITLES.

The GWDB serves as a convener and connector of workforce partners across the state, and as such many of the activities the Board engages in relate to meetings or convenings. This includes:

- *Quarterly Meetings:* The GWDB meets once a quarter to discuss and review state policies, programs and initiatives that impact the implementation of the State Vision, Goals and Strategies.
- *Committees, Subcommittees and Special Committees:* The GWDB standing committees and subcommittees, and any special committees, task forces or other working groups established by the GWDB Chairperson also meet throughout the calendar year in order to produce policy recommendations or reports to be considered by the full GWDB for approval.
- *Workforce Summit:* Starting in 2023 and happening annually thereafter, the GWDB hosts an annual Workforce Summit to bring together workforce development stakeholders around the State's Vision, Goals and Strategies for our workforce development system.
- *Goal Convenings:* Starting in 2024, the GWDB will host convenings with relevant partners and stakeholders to gain feedback and build plans and metrics for meeting each of our state's goals.
- *One Minnesota Workforce Shortage:* Starting in 2024 the GWDB will be the home of the One Minnesota Workforce Shortage goal to enable thoughtful, strategic, aligned, and proactive interagency decision-making and collaboration, and hold ourselves accountable for reaching a 4.4% vacancy rate overall and in the Drive for Five sectors.

The GWDB also serves in supporting the review and updating of state and federal policies related to workforce development and WIOA implementation, and carries out a number of activities to support proper adoption and implementation of policies, including:

- *Development of Minnesota's Combined State Plan:* The GWDB establishes a broad vision for workforce development in Minnesota, and this vision helps guide the development of Minnesota's Combined State Plan.
- *Workforce Development System Strategic Plan and Continuous Improvement:* The GWDB is required to submit a report to the legislature regarding the performance and outcomes of Minnesota's CareerForce locations in January of each odd-numbered year.
- *Legislative Report:* As required by Minnesota state statutes, the GWDB prepares a biannual legislative report to the Minnesota Legislature which

Commented [MK](3): @Kammen, Kay (DEED) update for the One Minnesota work

captures the insight and recommendations of the GWDB for consideration by the Legislature and state agencies.

- *Policies:* Starting in 2024 the GWDB will lead an agency-wide review of existing workforce policies and will convene partners and stakeholders in the development of updated policies.
- *Workforce Plans for Federal Funding Opportunities:* The GWDB has begun to play the convening or backbone organization role for federal funding opportunities, especially in developing workforce plans and identifying relevant partnerships to be part of the work.

The GWDB plays an important role in supporting workforce partnerships across the state to ensure the success of a workforce system rather than individual workforce programs. This includes:

- *Sector Partnerships:* The GWDB supports the development and implementation of best practices for sector partnerships in the state, as described in section II.c.1.
- *Local Workforce Boards and Regional Workforce Partners:* The GWDB partners with local boards in support of their implementation of WIOA and workforce programs. This also includes working with the LMI team and other agencies to ensure that the local boards have the information and policies they need to be successful.
- *Interagency Work:* GWDB staff facilitate cross-agency meetings with program administrators from across the workforce development system and will be utilizing information and dialogue from these meetings to develop more robust recommendations around system alignment and program coordination.

GWDB ROSTER

Leadership			
<u>Chair</u>		<u>Vice Chair</u>	
<u>Surya Iyer, Chair</u> President and COO, Polar Semiconductor		<u>DeLinda Washington</u> Sr. Vice President & Chief People Officer, Health Partners, Inc.	
Direct Appointments			
<u>Nicole Blissenbach</u> <u>Commissioner,</u> <u>Department of Labor</u> <u>& Industry</u> <u>Representative</u>	<u>Tikki Brown</u> <u>Commissioner,</u> <u>Department of</u> <u>Children, Youth, and</u> <u>Families</u>	<u>Erin Campbell</u> <u>Commissioner,</u> <u>Minnesota</u> <u>Management &</u> <u>Budget</u>	<u>Rebecca Cunningham</u> <u>President, University of Minnesota</u> <u>*Designee: Chancellor Lori Carrell</u>
<u>David Dively</u> <u>MN State Council on</u> <u>Disability</u>	<u>Cate Duin</u> <u>MN Association of</u> <u>Workforce Boards</u> (MAWB)	<u>Shireen Gandhi</u> <u>Commissioner,</u> <u>Department of Human</u> <u>Services</u>	<u>Shannon Geshick</u> <u>Executive Director, Minnesota</u> <u>Indian Affairs Council</u>

<u>Sia Her</u> <u>Executive Director,</u> <u>Council on Asian</u> <u>Pacific Minnesotans</u>	<u>Willie Jett II</u> <u>Commissioner,</u> <u>Department of</u> <u>Education</u> <u>*Designee: Angela</u> <u>Mansfield, Assistant</u> <u>Commissioner</u>	<u>Dennis Olson Jr.</u> <u>Commissioner, Office</u> <u>of Higher Education</u> <u>*Designee: Shannon</u> <u>Bryant, Executive</u> <u>Director, Workforce &</u> <u>Economic</u> <u>Development</u>	<u>Sonia Reyes</u> <u>Executive Director, Minnesota</u> <u>Council on Latino Affairs</u>
<u>Paul Schnell</u> <u>Commissioner,</u> <u>Department of Human</u> <u>Services</u> <u>*Designee: Jami</u> <u>Doeden, Associate</u> <u>Warden</u>	<u>Linda Sloan</u> <u>Executive Director,</u> <u>Council for</u> <u>Minnesotans of</u> <u>African Heritage</u>	<u>Matt Varilek</u> <u>Commissioner, Dept of</u> <u>Employment and</u> <u>Economic</u> <u>Development</u>	
<u>Legislative Representatives</u>			
<u>John Hoffman</u> <u>State Elected (Senate</u> <u>Majority</u> <u>Representative) (Ex-</u> <u>Officio)</u>	<u>Pete Johnson</u> <u>State Elected (House)</u> <u>(Ex-Officio)</u>	<u>Carla Nelson</u> <u>State Elected (Senate</u> <u>Minority</u> <u>Representative) (Ex-</u> <u>Officio)</u>	<u>Bernie Perryman</u> <u>State Elected (House Minority</u> <u>Representative) (Ex-Officio)</u>
<u>At-Large Members</u>			
<u>Naveen Agarwal</u> <u>Founder and Owner,</u> <u>Kiddie School of</u> <u>Maple Grove</u>	<u>Hannah Alstead</u> <u>Political and Labor</u> <u>Director, Teamsters</u> <u>Joint Local #32</u>	<u>Jeremy Andrist</u> <u>Business Manager,</u> <u>Plumbers and</u> <u>Pipefitters Local #6</u>	<u>Carol Anderson</u> <u>Co-owner</u> <u>Anderson Dairy Farms</u>
<u>Michael Berndt</u> <u>President, Inver Hills</u> <u>Community College</u>	<u>Misun Bormann</u> <u>HR Director –</u> <u>Workforce Director,</u> <u>Mayo Clinic</u>	<u>Deb Broberg</u> <u>Executive Director,</u> <u>RealTime Talent</u>	<u>Brian Bruess</u> <u>President, College of Saint Benedict</u> <u>and Saint John’s University</u>
<u>Bernadette Burnham</u> <u>President, Minnesota</u> <u>AFL-CIO</u>	<u>Gail Cruikshank</u> <u>Talent and</u> <u>Community Impact</u> <u>Director, Greater St.</u> <u>Cloud</u>	<u>Scott Cummings</u> <u>Minnesota Market</u> <u>Lead, Accenture</u>	<u>Barry Davies</u> <u>Business Manager, Labor – Iron</u> <u>Local #512</u>
<u>Irene Fernando</u>	<u>Deborah Gleason</u>	<u>Troy Haugen</u>	<u>Samuel Heimlich</u>

<u>Commissioner, Hennepin County</u>	<u>Owner, The Information Tamer</u>	<u>Director of Career & College Readiness, Lakes Country Service Cooperative</u>	<u>Business Representative, North Central States Regional Council of Carpenters</u>
<u>Steven Kalina</u> <u>President & CEO, Minnesota Precision Manufacturing Association</u>	<u>Erica Lester</u> <u>Workforce Development Manager, Minnesota Association of Community Health Centers</u>	<u>Matthew Lewis</u> <u>Vice President, Partnership Strategy, GREATER MSP Partnership</u>	<u>Lance Louis</u> <u>President & CEO, Louis Industries</u>
<u>Katie Lundmark</u> <u>Regional Director of Operations, Ecumen</u>	<u>Nicole Mattson</u> <u>Vice President, Care Providers of Minnesota</u>	<u>Melissa McLean</u> <u>Vice President of Workforce Initiatives, St. Paul Area Chamber</u>	<u>Ted Mondale</u> <u>Vice President of Workforce Partnerships, Summit Academy</u>
<u>Gabriel Mooney</u> <u>Corporate Project Manager, Central Boiler</u>	<u>Mary Niedermeyer</u> <u>Chief Executive Officer, CAPI USA</u>	<u>Sandra Pulles</u> <u>Chief Impact Officer, ServeMinnesota</u>	<u>Jeffrey Rainey</u> <u>Economic Development Director, Dakota Electric Association</u>
<u>Robert Stark</u> <u>Financial Advisor, Edward Jones Investment</u>	<u>Jennifer Theisen</u> <u>Chief People Officer, Stoneridge Software</u>	<u>Travis Thibodeau</u> <u>Chief of Staff, Minnesota Nurses Association</u>	<u>Brian Zirbes</u> <u>Executive Director, MN Association of Resources for Recovery and Chemical Health (MARRCH)</u>
Name		Business or Organization	Member Type
Aggarwal, Naveen		Kiddiegarten School of Maple Grove	Business Representative

Anderson, Carol	Anderson Farms	Business Representative
Berg, Joshua	Accessible Spaces	Business Representative
Broberg, Deb	RealTime Talent	Business Representative
Ellis, Kevion	St. Paul Area Chamber of Commerce	Business Representative
Jacobson, Ralph	Impact Power Solutions	Business Representative
Kalina, Steve	Minnesota Precision Manufacturing Association	Business Representative
Louis, Lance	Louis Industries	Business Representative
Lundmark, Katie	Ecumen	Business Representative
Mattson, Nicole	Care Providers of Minnesota	Business Representative
Mooney, Gabriel	Central Boiler	Business Representative
Rainey, Jeffrey	Dakota Electric Association	Business Representative
Ramirez, John	Latino Economic Development Center	Business Representative
Rodway, Ali	Pepper Foster Consulting	Business Representative
Sloan, Shannon	North Memorial Health System	Business Representative

Stark, Robert	Edward Jones Investment	Business Representative
Theisen, Jennifer	Stoneridge Software	Business Representative
Tollefson, Jeff	MnTech	Business Representative
Palmer, Tuleah	Blandin Foundation	Community-Based Organization
Van Acker, Kyle	Goodwill-Easter Seals Minnesota	Community-Based Organization
Varilek, Commissioner Matt	Minnesota Department of Employment and Economic Development	Core Program Representative (Titles I and III)
Jett, Commissioner Willie	Minnesota Department of Education	Core Program Representative (Title II)
Torgerson, Dee	Vocational Rehabilitation, DEED	Core Program Representative (Title IV)
Alstead, Hannah	Teamsters Joint Local 32	Labor Union
Burnham, Bernadette	AFL-CIO Minnesota	— Labor Union
Davies, Barry	Iron Workers Local 512	— Labor Union
Heimlich, Samuel	North Central States Regional Council of Carpenters	— Labor Union
Scott, Karlton	Minnesota Nurses Association	Labor Union
Parker, Scott	International Union of Painters and Allied Trades	Labor Union

Fernando, Commissioner Irene	Hennepin County	Local Elected Official
Campbell, Commissioner Erin	Minnesota Management and Budget	Non-Voting Member (required by State Statutes)
Dively, David	Minnesota Council on Disability	Non-Voting Member (required by State Statutes)
Geshick, Shannon	Minnesota Indian Affairs Council	Non-Voting Member (required by State Statutes)
Blissenbach, Nicole	Minnesota Department of Labor & Industry	Non-Voting Member (required by State Statutes)
Nesheim, Eric	Literacy Minnesota	Non-Voting Member (required by State Statutes)
Olson, Dr. Dennis	Minnesota Office of Higher Education	Non-Voting Member (required by State Statutes)
De Vera, Emma	St. Paul Public Libraries	Non-Voting Member (required by State Statutes)
Schnell, Paul	Minnesota Department of Corrections	Non-Voting Member (required by State Statutes)
Smith, Roy	Iron Range Resources & Rehabilitation Board	Non-Voting Member (required by State Statutes)
Her, Sia	Council on Asian Pacific Minnesotans	Non-Voting Member (required by State Statutes)
Sloan, Linda	Council for Minnesotans of African Heritage	Non-Voting Member (required by State Statutes)
Tock, Rosa	Minnesota Council on Latino Affairs	Non-Voting Member (required by State Statutes)

Pribbenow, Paul Dr.	Augsburg University	Other Member as Required by State Statutes
Berndt, Michael	Inver Hills Community College	Other Member as Required by State Statutes
Cunningham, Rebecca	University of Minnesota	Other Member as Required by State Statutes
Harpstead, Jodi	Minnesota Department of Human Services	Other Member as Required by State Statutes
Haugen, Troy	Lakes Country Service Cooperative	Other Member as Required by State Statutes
Olson, Chancellor Scott	Minnesota State Colleges and Universities	Other Member as Required by State Statutes
Hoffman, Sen. John	Minnesota Senate	State Legislator
Nelson, Sen. Carla	Minnesota Senate	State Legislator
Perryman, Rep. Bernie	Minnesota House of Representatives	State Legislator
Xiong, Rep. Jay	Minnesota House of Representatives	State Legislator

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

A. ASSESSMENT OF CORE AND ONE-STOP PROGRAM PARTNER PROGRAMS.

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. 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. 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.

Each of the core programs will be assessed based on the performance accountability measures and other means to assess the quality, effectiveness and improvements of the programs by local area or provider. The performance accountability measures will continue to follow federal requirements which are pending within the approval of final regulations from the Department of Labor for WIOA Titles I and III and pending legislative changes from MDE for WIOA Titles II and IV. Based on the results of those negotiations, all of these efforts will be modified to take into consideration the local and regional planning goals once the local and regional plans are approved. At the time of this State Combined Plan submission, this process has not been completed.

Additionally, programs are assessed in various ways and through different methods. Each WIOA title has existing approaches to gauge the quality, effectiveness and improvements of programs that can be broken down by local area or provider. For the title I and III programs, the following methods are used.

- Mandated Reports to the Legislature for those programs funded by state workforce, general fund, and other special state funds.
- Annual Program Results/Reports for both federal and state programs, which often provide the federal negotiated performance goals and outcomes.
- Customer Satisfaction assessments for job seekers and employers.
- A Uniform Report Card for specific workforce development programs.
- For many programs, solicitations for services (requests for proposals) are posted on DEED's website and through the State Register in an effort to attract the best possible proposals.

The Adult and Dislocated Worker Team assesses program performance throughout the year through close collaboration with DEED's Performance and Technical Management (PTM) team. PTM assembles quarterly and annual PIRL reports and submits them to USDOL. All Title I Adult and Dislocated Worker programs must participate in the State of Minnesota's Uniform Outcome Report Card. This mandated report includes several measures that the U.S. Department of Labor (DOL) does not. Including Median wage change by previous employment status, Retention in Q3 and Q8 after exit, and Occupation of employment in Q1, Q3, and Q8 after exit. Minnesota evaluates WIOA programs under 20 CFR § 682.200. For Title I Adult and Dislocated Worker Programs, the following evaluations have been or will be conducted:

- *Social Vulnerability Index (SVI) Study (Phase I complete Phase II beginning)*: This study uses the Center for Disease Control's Social Vulnerability Index to assess if Title I programs serve Minnesotans from the most marginalized parts of the state. This study resulted in DEED setting a goal to increase the percentage of people they serve from the most marginalized parts of the state (defined using the SVI). PTM is working with WIOA Adult and Dislocated Worker to establish baselines for Title I adult programs and create interactive multi-layered maps and measures to help program staff target outreach. An example of one of these tools and evaluations is here:

<https://public.tableau.com/app/profile/magda.olson/viz/DWandWIOASVI/DemographicProfile?publish=yes>

- *Family-Sustaining Wage Calculation and Attainment study (Complete)*: This study has two parts. The first involves working with the LMI team to calculate individual-level family-sustaining wage thresholds of participants based on their family size and location. The second part consists in analyzing when participants exit a program and if they attain a family-sustaining wage within a year after exit. This study helps programs better understand if participants can support themselves post-exit. The results of this study indicated that while a decline in enrollment (mainly attributable to the pandemic and closure of services) prevented programs from attaining similar family-sustaining wage placement numbers, the percentage of participants who achieved a family-sustaining wage recovered to pre-pandemic levels and saw some increases in marginalized groups like BIPOC participants. The final dashboard can be found here:
<https://public.tableau.com/app/profile/magda.olson/viz/FSWReportMMB6272022/FSWbyDemographic>
- *Study of changing populations (In progress)*: This study includes partnering with the LMI team to see if programs are properly set up to serve Minnesotans most impacted by the COVID-19 Pandemic. The initial results of this study indicate that Title I Adult programs have pivoted to serving more diverse customers across every measure of marginalization we analyzed after the COVID-19 Pandemic. The next step of this study is examining the regional impacts of COVID-19 in Minnesota and seeing if Title I programs served industries impacted by pandemic layoffs. The report will be available in the late Fall of 2023.
- *Co-Enrollment Study (planning)*: This study, which might be done with the Minneapolis Federal Reserve, will examine the impact of co-enrollment between Title I and state-funded workforce programs. This study will look at training completion, credential attainment, employment, retention, and median wage, along with program reentry and how these measures are impacted by co-enrollment.

In addition to the evaluations above, Minnesota continues to be a willing partner with the DOL in other states. It is willing to continue to share our approach to evaluation, equity analysis, and how to conduct rigorous independent evaluations without needing an external vendor via technical assistance sessions or larger meetings.

Continuous Quality Improvement strategies are on-going and follow the Plan-Do-Study-Act (PDSA) cycle as a “trial-and-learning” method to test changes quickly for the Dislocated Worker and Adult programs. These methods are especially important when new or updated guidance is released by the U.S. Department of Labor. As new guidance is received, multiple protocols, including database and data entry procedures, need to be evaluated to determine the actual impacts of the change. This may include, applying changes to multiple programs, updating policy, remapping the state’s case management system (Workforce One), updating case management desk guides, and scheduling training sessions to inform LWDAs. Planning for USDOL monitoring visits begin with coordinating with local areas to inform of the planned visit and to prepare files for the monitoring visit. DEED is already unified with local areas via Workforce One. Minnesota responds to USDOL monitoring reports in collaboration with LWDAs.

The WIOA Title II program is operated by the MDE, which prioritizes and measures program quality through accountability expectations and activities that focus on both compliance and best practice according to research and experience. The expectations and activities include:

1. *THE STATE ADULT EDUCATION MANAGEMENT INFORMATION SYSTEM (MIS) DATA:* Minnesota's MIS, called SiD, balances both program quality and program compliance with state and federal expectations. In addition to required reports, local providers can use SiD to analyze student persistence, program outcomes, and other measures at the consortium, site, class and student level.
2. *A STATE ADULT EDUCATION GRANTEE REPORT CARD:* The report card notes actual performance and ranks providers by key program data measures, including measurable skill gain by population, cost of programming per individual served, intensity of service provided, and percentage of population served.
3. *A PROGRAM IMPROVEMENT PROCESS:* Programs will be identified for review based on rankings in the state adult education report card and will undergo a comprehensive review and monitored implementation of a program improvement plan that requires local providers to complete site visits, workshop activities, reports, and plans to strengthen program performance and quality. (For more information on Program Improvement, see the response to (D) above.)
4. *INTENSIVE PROGRAM APPLICATION CYCLE:* On a five- to six-year basis, adult education providers are required to complete an in-depth application as a method to adhere to state statute governing local adult education programming. These in-depth applications are reviewed and scored by a team of state staff from MDE and local AEFLA providers. In this intensive application, local providers describe their:
 1. Consortium,
 2. Program accountability procedures,
 3. Professional development priorities and activities,
 4. Proposed programming,
 5. Local program governance,
 6. Program collaboration with key stakeholders and partners,
 7. Technology resources and integration,
 8. Future plans, and
 9. Performance.
5. *GRANTEE MONITORING SITE CALLS AND VISITS:* All grantees are subject to monitoring calls and site visits that focus on policy compliance and program quality through multiple methods:
 1. All AEFLA grantees receive site visits on a rotating basis, at least once every five-to-six years, when the program participates in in-depth application process to continue receiving state adult education (ABE) funding to comply with state statute;
 2. Monitoring visits based on items that get escalated by the MDE Adult Education team through the monthly data review process;

3. Providers with low performance participate in site visits through the program improvement process;
4. Local adult education providers that participate in state initiatives and/or receive special grants through state or federal funding typically receive site visits as part of their participation; and
5. Local providers request special technical assistance site visits as they face issues
6. *ASSESSING THE QUALITY OF PROFESSIONAL DEVELOPMENT PROGRAMS:*
 1. Minnesota's Adult Education Supplemental Services system, which is funded with a combination of state and federal leadership funds provides training that supports local programs in implementing program components needed to meet the wide range of needs of Minnesota's adult education participants including: distance education, use of technology for instruction as well as program management; services related to serving students with disabilities; instructional methodology including EBRI and the Teaching Numeracy to Adults Cohort; content standards including CCRS, ACES and Northstar; IET, contextualization and career pathway programming; volunteer recruitment and training; assessment; partner collaborations including workforce, TANF and SNAP, etc. Information regarding the relevance, quality and success of each component is collected through an annual professional development survey. In addition, biannual reporting regarding participation and locally collected participant evaluations are required of all Supplemental Services providers.
 2. The statewide Supplemental Services noted above are available to all paid and volunteer staff.
 3. Dissemination of information about models and promising practices are facilitated by Minnesota's Supplemental Services providers. Each provider maintains a website of related resources and all providers provide content for Minnesota's monthly PD Update newsletter. Minnesota also maintains a career pathway-related curriculum repository. Information regarding the success of the dissemination system is collected annually as part of the Professional Development Survey and via locally collected participant evaluations.

The one-stop program partners will be assessed each year on their respective program requirements. Additionally, the state will consider additional methods of evaluation, including surveys of customers, monitoring visits and other methods with which to assess the success and effectiveness of the programs they operate.

B. PREVIOUS ASSESSMENT RESULTS

For each four-year state plan and state plan modification, 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), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

The tables below present the percentage of the negotiated measure attained by the State of Minnesota. As stated in TEGL 11-19, Change 1, failure occurs for individual indicators when a score falls below 50 percent of the adjusted level of performance. Alternatively, failure occurs for the overall state program when a score falls below 90 percent. Percentages over 100

indicate the state exceeded the measure. Percentages greater than 50 and less than 100 indicate the state met the measure. Percentages of less than 50 indicate the state failed to meet the measure, in accordance with Training and Employment Guidance Letter 11-19, Change 1.

Program Year 2022 WIOA Performance Assessment data is still preliminary and based on comparing Minnesota's actual levels of performance to our negotiated levels of performance. The release of Minnesota's adjusted levels of performance by the USDOL may change these percentages.

Table 1: Program Year 2022 Performance Assessment -- Preliminary

Performance Measure	WIOA Adult	WIOA Dislocated Worker	WIOA Youth	Wagner-Peyser	Title IV Vocational Rehabilitation
Q2 Employment	109.5%	101.2%	111.0%	104.9%	112.2%
Q2 Earnings	126.2%	102.8%	136.0%	108.6%	109.1%
Q4 Employment	111.5%	102.8%	110.9%	99.0%	116.5%
Credential Attainment	105.6%	103.6%	85.2%	N/A	141.9%
Measurable Skills Gain	N/A	N/A	N/A	N/A	N/A
Effectiveness in Serving Employers	N/A	N/A	N/A	N/A	N/A
Overall State Program Score	N/A	N/A	N/A	104.2%	N/A

Table 2: Program Year 2021 WIOA Performance Assessment

Performance Measure	WIOA Adult	WIOA Dislocated Worker	WIOA Youth	Wagner-Peyser
Q2 Employment	109.5%	101.2%	111.0%	104.9%
Q2 Employment	86.4%	96.3%	98.4%	108.9%
Q2 Earnings	110.1%	118.7%	125.9%	117.2%
Q4 Employment	N/A	N/A	N/A	N/A
Credential Attainment	N/A	N/A	N/A	N/A
Measurable Skills Gain	N/A	N/A	N/A	N/A
Effectiveness in Serving Employers	N/A	N/A	N/A	N/A

Table 3: Program Year 2020 WIOA Performance Assessment

Performance Measure	WIOA Adult	WIOA Dislocated Worker	WIOA Youth	Wagner-Peyser
Q2 Employment	89.9%	104.4%	99.1%	93.4%
Q2 Earnings	103.8%	120.6%	133.9%	109.6%
Q4 Employment	N/A	N/A	N/A	N/A
Credential Attainment	N/A	N/A	N/A	N/A
Measurable Skills Gain	N/A	N/A	N/A	N/A
Effectiveness in Serving Employers	N/A	N/A	N/A	N/A
Overall State Program Score	N/A	N/A	N/A	N/A

Table 1: PY22 Performance assessment

Performance Measure	Title II Adult Education (ABE)
Q2 Employment	106.9%
Q2 Earnings	125.2%
Q4 Employment	110.1%
Credential Attainment	92.2%
Measurable Skills Gain	133.2%
Effectiveness in Serving Employers	N/A
Overall State Program Score	N/A

Table 2: PY21 Performance assessment

Performance Measure	Title II Adult Education (ABE)
Q2 Employment	92.7%
Q2 Earnings	121.5%
Q4 Employment	100.2%
Credential Attainment	71.4%
Measurable Skills Gain	69.5%
Effectiveness in Serving Employers	N/A
Overall State Program Score	N/A

Table 3: PY20 Performance assessment

Performance Measure	Title II Adult Education (ABE)
Q2 Employment	90.1%
Q2 Earnings	109.3%
Q4 Employment	103.7%
Credential Attainment	82.7%
Measurable Skills Gain	53.5%
Effectiveness in Serving Employers	N/A
Overall State Program Score	N/A

C. EVALUATION

Describe how the State will conduct evaluations and research projects of activities carried out in the State 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 (WIOA Section 116(e)).

Minnesota's primary conductor of WIOA evaluations and research projects is the Office of Performance and Technical Management (PTM). PTM has data knowledge as producers of the Participant Individual Record Layout (PIRL) and is independent of programs as they are not funded with WIOA funds. Minnesota has just recently finished its PY22 WIOA Title I evaluation and posted the results on the mandated reports section of the state website. PTM is working with both Employment and Training Programs (ETP) and the local areas to create a feedback loop where local boards can respond to evaluation results and provide feedback and recommendations for future areas of evaluation. Minnesota's process for the next evaluation cycle will be as follows:

1. Solicit feedback from local boards on the current evaluation report and potential topics for future evaluations (current status as of this report).
2. PTM works with ETP to select an evaluation topic based on stakeholder feedback and writes a proposal for agency leadership to review.
3. When agency leadership approves the evaluation topic, PTM begins work on the evaluation.
4. Present the results to stakeholders, solicit feedback, provide technical assistance on recommendations (when applicable), and begin the process anew.

Potential topics for the subsequent evaluation include but are not limited to:

1. Impact of co-enrollment in state programs on WIOA program participant outcomes.
2. Analysis of what barriers or combinations thereof most negatively impact WIOA program participants.

3. Effectiveness of agency efforts to direct time-limited SNAP recipients to WIOA Title I programs.

PTM and ETP send representation to all regularly scheduled DOL evaluation meetings and continue collaborating and communicating with DOL on Minnesota's evaluation efforts. In addition, Minnesota has been chosen to be a member of the Coleridge Institute Applied Data Analytics Training. This training will foster bonds between PTM, Title I, Title III, Labor Market Information, and the Department of Human Services.

1. ***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),***

Minnesota will obligate 85 percent of the WIOA Youth Formula allocation to local service providers.

1/3 is based on the WDA's relative share of the number of unemployed in areas with an unemployment rate of 6.5% or higher.

1/3 is based on the WDA's relative share of the number of unemployed in excess of 4.5% of the civilian labor force (in the WDA or in the areas of substantial unemployment within the WDA—whichever is higher).

1/3 is based on the WSA's relative share of the number of youth between the ages of 16 and 21 whose income or family income is at or below poverty or below 70 percent of the lower living standard income level. Since it is designated as a Rural Concentrated Employment Program under section 107 of WIOA, Rural Minnesota CEP has a slightly different requirement for the number of persons in this category. Data is provided by DOL for this portion of the formula.

The state ensures that no WDA allocation falls below 90 percent of the previous two year's average share of youth allocations. Adjustments are made as necessary to maintain the 90 percent hold-harmless provision for impacted WDAs.

Title II: Between Program Years 2020 to 2022, the Adult Education (ABE) system increased outcomes in all WIOA indicators. In Program Year 2022, ABE met 4 of 5 federal targets and only one ABE provider fell below the program improvement benchmarks. The Minnesota Department of Education has supported the provider to help analyze their performance and potential improvement. Systemwide, the Minnesota Department of Education will continue to highlight technical assistance and professional development on accountability measures, targets, and expectations, utilizing the results of the 2024 federal monitoring report.

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)

Minnesota will obligate 85 percent of the WIOA Youth Formula allocation to local service providers.

1/3 is based on the WDA's relative share of the number of unemployed in areas with an unemployment rate of 6.5% or higher.

1/3 is based on the WDA's relative share of the number of unemployed in excess of 4.5% of the civilian labor force (in the WDA or in the areas of substantial unemployment within the WDA—whichever is higher).

1/3 is based on the WSA's relative share of the number of youth between the ages of 16 and 21 whose income or family income is at or below poverty or below 70 percent of the lower living standard income level. Since it is designated as a Rural Concentrated Employment Program under section 107 of WIOA, Rural Minnesota CEP has a slightly different requirement for the number of persons in this category. Data is provided by DOL for this portion of the formula.

The state ensures that no WDA allocation falls below 90 percent of the previous two year's average share of youth allocations. Adjustments are made as necessary to maintain the 90 percent hold-harmless provision for impacted WDAs.

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

Minnesota will obligate 85 percent of its WIOA Adult program formula allocation to local service providers, reserving 15 percent for administration and "10 percent" allowable activities for statewide goals.

When distributing the remaining amount to local service providers, staff take into account the following elements by converting them into shares of Minnesota as a whole and weighted equally:

- The number of economically disadvantaged adults in each Local Workforce Development Area (LWDA)
- The total number of unemployed individuals
- The number of excess unemployed individuals (above the state average) in areas of substantial unemployment

Adjustments are made as necessary to maintain the 90 percent hold-harmless provision ensuring that no local area has less than 90 percent of their two-year average.

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

Minnesota will obligate 75 percent of its WIOA Dislocated Worker program formula allocation to local service providers using a combination of labor market information, census data and unemployment insurance information. DEED first reserves five percent of the total allocation for administration, ten percent for allowable statewide activities, and the fully allowable 25 percent for rapid response activity (grants to fund mass layoff projects and statewide rapid response staff).

Three factors to distribute the 75 percent are weighted equally, impacting the preliminary share to local providers:

1. The share of the state's unemployed persons living in a WDA
2. The share of the state's permanently separated unemployed persons living in that WDA
3. The share of statewide total weeks paid of UI to permanently separated claimants

Minnesota then adjusts the share by job and earnings density, measuring a LWDA's standard deviation from the state average, and adjusts the dollars up or down accordingly. Finally, Minnesota includes a 90 percent hold—harmless provision as well as a 130 percent funding cap to minimize any significant changes in funding. This means that each local area is guaranteed to receive an allocation percentage per year that is no less than 90 percent of the average of the preceding two years' allocations.

As stated in WIOA sec. 133(a)(2), a State may reserve up to 25 percent of its allotted dislocated worker funds for rapid response activities. Once the State has reserved adequate funds for rapid response activities, such as those described in §§ 682.310, 682.320, and 682.330, any of the remaining funds reserved may be provided to local areas that experience increases of unemployment due to natural disasters, mass layoffs or other events, for provision of direct career services to participants if there are not adequate local funds available to assist the dislocated workers. States may wish to establish the policies or procedures governing the provision of additional assistance as described in § 682.340.

B. FOR TITLE II

I. DESCRIBE THE METHODS AND FACTORS THE ELIGIBLE AGENCY WILL USE TO DISTRIBUTE TITLE II FUNDS.

The Minnesota Department of Education (MDE) is the State's Eligible Agency for Adult Education programs. MDE is responsible for administering funds and providing program/performance oversight to grantees. During grant years 2016–17 and 2021–22, MDE implemented a competitive application process for all federal AEFLA funding, including WIOA Sections 231(adult education) and 225 (corrections education) activities. The grant competitive applications are based on the 13 considerations in Title II of WIOA and included additional state ABE priorities. As a result of that process, 36 providers from throughout Minnesota were selected to receive funding beginning July 1, 2022. Minnesota will conduct a new grant competition during the 2027–28 year in order to identify grantees who will begin receiving federal ABE funds on July 1, 2028 (unless WIOA is reauthorized before then and requires a competition earlier).

Adult education eligible providers approved in 2022 will continue to be eligible to receive AEFLA funding, as long as they adhere to state and federal grant expectations, as measured through annual applications, financial reports, and program performance reports.

TIMELINE

The following steps and timeline were followed in 2017 and 2022; they will be used again for the 2028 WIOA AEFLA competition:

January: MDE publishes and promotes federal AEFLA provider grant application materials

January-February: MDE provides technical assistance to inquiries from eligible providers

February-March: MDE recruits reviewers to score and rate WIOA-aligned federally-funded AEFLA grant applications

March: Due date for federal AEFLA provider grant applications

March: MDE screens applications to determine which providers in each application meet demonstrated effectiveness requirements

March/April: Applications from providers that have demonstrated effectiveness are forwarded to official reviewers and to the appropriate workforce development boards that serve the same area as the proposed application

April-May: Official reviewers score and rate federal AEFLA provider grant applications by region; workforce development boards review and provide feedback on federal AEFLA provider grant applications that fall within their workforce service areas

May-June: MDE decides which applicants will be approved as providers based on reviewer scores and ratings, workforce development board feedback, and application's response to the conditions and criteria in the application materials

June: MDE announces awarded grant applicants that will receive federal AEFLA funding as providers

July 1: Awarded federal AEFLA providers begin grant cycle, programming and funding with technical assistance provided by the MDE Adult Education team

MDE used the considerations specified in Section 231(e) of WIOA and listed below as the criteria for selecting and funding eligible providers in 2017 and 2022, which will be used again in future competitions until WIOA is reauthorized and the considerations change. As part of the RFP process, agencies were/will be required to provide narrative detail describing how they will meet each consideration.

1. Needs Assessment: The degree to which the provider is responsive to (A) regional needs as identified in the local plan under Section 108; and (B) serving individuals in the community who are identified in such plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills and who are English language learners.
2. Individuals with Disabilities: The degree to which the provider is able to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.
3. Past Effectiveness: The degree to which the provider demonstrates past effectiveness in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in Section 116, especially with respect to eligible individuals who have low levels of literacy.
4. Alignment with One-stop Partners: The degree to which the eligible provider is responsive to, and demonstrates alignment between, proposed activities and services and the strategy and goals of the local plan under Section 108 as well as the activities and services of the one-stop partners.
5. Intensity, Quality, and Instructional Practices: The degree to which the eligible provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and uses instructional practices that include the essential components of reading instruction.

6. Research Based Educational Practices: The degree to which the eligible provider's activities including reading, writing, speaking, mathematics, and English language acquisition instruction, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice.
7. Effective Use of Technology: The degree to which the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance.
8. Integrated Education and Training: The degree to which the eligible provider's activities offer learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship.
9. Qualified Staff: The degree to which the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the state, where applicable, and who have access to high quality professional development, including through electronic means.
10. Partnerships and Development of Career Pathways: The degree to which the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce development boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways.
11. Flexible Schedules and Coordination with Support Services: The degree to which the eligible provider's activities offer flexible schedules and coordination with Federal, State, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs information management system that has the capacity to report measurable participant outcomes (consistent with Section 116) and to monitor program performance.
12. Information management system: The expectation will be that the eligible provider will use the State-administered designated MIS for all grant-related data collection and reporting; and
13. English Language Acquisition and Civics Education: The degree to which the eligible provider has a demonstrated need for additional English language acquisition programs and civics education programs.

ADDITIONAL CRITERIA

In addition to the above 13 considerations, the grant applications also required descriptions of proposed:

- Location and service area, according to school district boundaries;

- The scope of the program, including ensuring that proposed services align with federally allowable adult education activities;
- A description of the population to be served;
- Fiscal management procedures and audit history;
- Capacity to offer programming and evidence of the organization's past effectiveness in providing AEFLA-eligible activities and services;
- Budget, as well as programmatic information regarding statutory requirements;
- Coordination with other service providers to provide wrap-around services to participants (e.g., child care, transportation)
- A description of how the program will align activities to the Local, Regional, and/or State Plan for WIOA providers and supportive services.

AWARDING AND DISTRIBUTING GRANTS AND FUNDS

Applicants must select either a geographic area that they will cover or describe a special population that they will serve.

- **Geographic Area Applications:** For each school district geographic area, up to one grant applicant will be awarded. Applicants must identify the proposed area of service and can select one or more geographic areas they will serve in the application. In 2022, the majority of applications (33 of 36) were for geographic areas.
- **Special Population Applications:** Applicants must describe the special and/or statewide population they propose to serve, why that population needs adult education services, and why/how the applicant is best equipped to provide adult education services for the population. In 2022, 3 special population applications were approved: 1. Adults incarcerated in prisons were selected to be served by the Minnesota Department of Corrections; 2. Adults who are deaf or hard-of-hearing were selected to be served by ThinkSelf; and 3. Native American adults living and working across multiple Tribal Nations were selected to be served by American Indian OIC.

Applications are reviewed by the Minnesota Department of Education, workforce development boards, and an official review committee.

- The Minnesota Department of Education first screens all applications to determine if grantees and providers are eligible applicants that have demonstrated effectiveness in serving eligible adults. If the grantee and all providers demonstrate effectiveness, applications are forwarded to the workforce development boards and to the official review committees.
- The workforce development boards review applications that are proposing to serve in their specific workforce development area. The boards review the applications for alignment with local and regional workforce development efforts and needs. Feedback for the applications is provided to the Minnesota Department of Education, which shares the feedback with the applicants.
- The official review committees utilize a review form to score applications on responses to the narrative questions, which primarily consists of the 13 considerations. Each application is given a score that is an average of all reviewer scores, feedback on

strengths and weaknesses in the application, and a recommendation on whether the application should be approved. The Minnesota Department of Education uses this information to make decisions on which applications to fund.

AEFLA grant funding is distributed as a formula, primarily based on contact hours and enrollees served by the grantee in the prior year. (New applicants estimate services provided with the Minnesota Department of Education as part of the grant application process.) An additional \$50,000 is distributed as regional transitions funding to each of the 10 Adult Education regions to collaboratively develop programming focused on transitioning to employment and postsecondary, relationships with postsecondary and workforce development partners, and align with the workforce development areas and plans. The ten regions were determined by population size and the number of partners in the area:

- Central Minnesota;
- Northeast Minnesota;
- Northwest Minnesota;
- Southeast Minnesota;
- Southwest Minnesota;
- East Metro area;
- West Metro area;
- Minneapolis;
- St. Paul; and
- Minnesota correctional facilities.

All approved grantees are part of one of these regions and must be included in the regional transitions planning process.

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

The Minnesota Department of Education (MDE) is the State's Eligible Agency for Adult Education programs. MDE is responsible for administering funds and providing program/performance oversight to grantees. During grant years 2016–17 and 2021-22, MDE implemented a competitive application process for all federal AEFLA funding, including WIOA Sections 231(adult education) and 225 (corrections education) activities. The grant competitive applications are based on the 13 considerations in Title II of WIOA and included additional state ABE priorities. As a result of that process, 36 providers from throughout Minnesota were selected to receive funding beginning July 1, 2022. Minnesota will conduct a new grant competition during the 2027-28 year in order to identify grantees who will begin receiving federal ABE funds on July 1, 2028 (unless WIOA is reauthorized before then and requires a competition earlier).

Adult education eligible providers approved in 2022 will continue to be eligible to receive AEFLA funding, as long as they adhere to state and federal grant expectations, as measured through annual applications, financial reports, and program performance reports.

TIMELINE

The following steps and timeline were followed in 2017 and 2022; they will be used again for the 2028 WIOA AEFLA competition:

January: MDE publishes and promotes federal AEFLA provider grant application materials

January-February: MDE provides technical assistance to inquiries from eligible providers

February-March: MDE recruits reviewers to score and rate WIOA-aligned federally-funded AEFLA grant applications

March: Due date for federal AEFLA provider grant applications

March: MDE screens applications to determine which providers in each application meet demonstrated effectiveness requirements

March/April: Applications from providers that have demonstrated effectiveness are forwarded to official reviewers and to the appropriate workforce development boards that serve the same area as the proposed application

April-May: Official reviewers score and rate federal AEFLA provider grant applications by region; workforce development boards review and provide feedback on federal AEFLA provider grant applications that fall within their workforce service areas

May-June: MDE decides which applicants will be approved as providers based on reviewer scores and ratings, workforce development board feedback, and application's response to the conditions and criteria in the application materials

June: MDE announces awarded grant applicants that will receive federal AEFLA funding as providers

July 1: Awarded federal AEFLA providers begin grant cycle, programming and funding with technical assistance provided by the MDE Adult Education team

MDE used the considerations specified in Section 231(e) of WIOA and listed below as the criteria for selecting and funding eligible providers in 2017 and 2022, which will be used again in future competitions until WIOA is reauthorized and the considerations change. As part of the RFP process, agencies were/will be required to provide narrative detail describing how they will meet each consideration.

Needs Assessment: The degree to which the provider is responsive to (A) regional needs as identified in the local plan under Section 108; and (B) serving individuals in the community who are identified in such plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills and who are English language learners.

1. **Individuals with Disabilities:** The degree to which the provider is able to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.
2. **Past Effectiveness:** The degree to which the provider demonstrates past effectiveness in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in Section 116, especially with respect to eligible individuals who have low levels of literacy.
3. **Alignment with One-stop Partners:** The degree to which the eligible provider is responsive to, and demonstrates alignment between, proposed activities and services

and the strategy and goals of the local plan under Section 108 as well as the activities and services of the one-stop partners.

4. **Intensity, Quality, and Instructional Practices:** The degree to which the eligible provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and uses instructional practices that include the essential components of reading instruction.
5. **Research Based Educational Practices:** The degree to which the eligible provider's activities including reading, writing, speaking, mathematics, and English language acquisition instruction, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice.
6. **Effective Use of Technology:** The degree to which the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance.
7. **Integrated Education and Training:** The degree to which the eligible provider's activities offer learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship.
8. **Qualified Staff:** The degree to which the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the state, where applicable, and who have access to high quality professional development, including through electronic means.
9. **Partnerships and Development of Career Pathways:** The degree to which the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce development boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways.
10. **Flexible Schedules and Coordination with Support Services:** The degree to which the eligible provider's activities offer flexible schedules and coordination with Federal, State, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs information management system that has the capacity to report measurable participant outcomes (consistent with Section 116) and to monitor program performance.
11. **Information management system:** The expectation will be that the eligible provider will use the State-administered designated MIS for all grant-related data collection and reporting; and
12. **English Language Acquisition and Civics Education:** The degree to which the eligible provider has a demonstrated need for additional English language acquisition programs and civics education programs.

ADDITIONAL CRITERIA

In addition to the above 13 considerations, the grant applications also required descriptions of applicants:

- Location, service area, the scope of the program, a description of the population to be served, fiscal management procedures, and audit history;
- Capacity to offer programming and evidence of the organization's past effectiveness in providing AEFLA-eligible activities and services;
- Budget, as well as programmatic information regarding statutory requirements;
- Coordination with other service providers to provide wrap-around services to participants (e.g., child care, transportation)
- A description of how the program will align activities to the Local, Regional, and/or State Plan for WIOA providers and supportive services.

The Minnesota Department of Education utilizes its website and an electronic grants management system to announce and publicly post the funding for all eligible applicants during the grants competition. The eligible applicants will match the WIOA language for eligible providers for Adult Education. Any entity that meets the eligible provider definition is able to apply and the Minnesota Department of Education will ensure applicants demonstrate effectiveness in order to qualify.

Starting in Program Year 2024, a new grants system, named MEGS, will be utilized. This system is designed to meet federal expectations, including Universal Guidance, and is used for MDEs other federal education grant postings, applications, and funding.

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.

The distribution of Minnesota's allotment of VR110 funds between the General and Blind agencies is based upon a methodology submitted to the Rehabilitation Services Administration in 1975. This methodology, still being used today, distributes 82 percent of Minnesota's allotment to the General Agency and 18 percent to the Blind Agency. Funds are distributed to states based on a statutory formula that takes into account population and per capita income in determining the amount of Federal funds that are available to states for vocational rehabilitation program purposes.

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.

Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

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

Workforce One (WF1) is a web-based case management application used by 2,000 state, city, county, and non-profit employees to track services to more than 100,000 customers across Minnesota's county offices, CareerForce locations, and Vocational Rehabilitation Services Offices. WF1 was created through a partnership of three Minnesota state agencies — the DHS, DEED, and MNIT.DEED. There are over 20 state and federally-funded workforce training programs — including WIOA Adult, Dislocated Worker and Youth — that track program participants in WF1.

Tracking customer services for participants in all employment and training programs in a single system helps to ensure consistency in service delivery and data collection. Case managers are able to view enrollments and services in some programs outside of those they work on, allowing them to target resources where customers need them most. Providers are able to closely monitor their customers' outcomes and deliver additional services when necessary to ensure the best outcome. Meeting federal and state employment and training reporting requirements is more efficient and less expensive because of standardized data collection and reporting within WF1.

System Management is currently anchored, from a data perspective, within Workforce One. This system supports data management and collaboration across WIOA titles I and IV; TANF and SNAP E&T, including all of the local partners delivering the related services. This system also has the capability to store participant documents electronically, streamlining administrative activities and monitoring.

Workforce One serves as a resource for not only the tracking of data but also used as a system which shares information between programs and identifies individuals whom may be co-enrolled in several programs. DEED and Minnesota Information Technology (MNIT) at DEED's staff serve as support to all users of this system and also provide recommendations for system improvements. Workforce One is Minnesota's primary tool for tracking program participant data. Workforce One Connect is a mobile app that customers can use to send messages and documents to their staff, and also access local resources. MinnesotaWorks.net, our labor exchange, also tracks data, including the majority of the state's reportable individual activities, as well as Title III program participants and business/employer services data.

Workforce One Connect is a mobile app that customers can download on a smartphone or tablet. It allows customers to send messages and documents, and access local resources. Staff receive those messages and documents in the Workforce One case management system and are able to reply to the customer. Staff may also post local resources that customers can view in the app.

For its business customers, DEED leverages Salesforce. The use and cost of Salesforce is shared by both internal users (Workforce Strategy Consultants, [Employer Engagement Specialists](#), Veterans employment representatives, [Vocational Rehabilitation Services](#), DEED's economic

development programs, the Minnesota Trade Office, Communications, and the Rapid Response team) and some external users.

Salesforce allows these organizations to collaborate on business visits, to share information, and communicate to reduce duplication of services. Salesforce provides customized reports on business needs and services.

Minnesota uses personally identifiable information (PII) from customers to create common identifiers which are used to link records across our different MIS. This is currently done for WIOA Titles I, III, and IV, as well as the DOL-administered partner programs such as Jobs for Veterans State Grants, Migrant and Seasonal Farmworker Services, National Dislocated Worker Grants, and Trade Adjustment Assistance. By linking participant records in this manner, data related to demographics, barriers, and services in our different MIS is made interoperable for the purposes of federal performance outcome reporting, as well as evaluation and assessment. Our WIOA Title III Wagner-Peyser Participant Individual Record Layout (PIRL) file is an excellent example of this. Participant records, including their demographics, employment barriers, and service histories from two different MIS are reconciled to produce a single PIRL file that is used for performance outcome reporting as well as evaluation and assessment activities.

For WIOA Title II, three different state agencies exchange the PII necessary to link Adult Education and Family Literacy Act (AEFLA) participants to employment and post-secondary education data. The data sharing agreements established by the state ensures the necessary data can be efficiently and effectively exchanged so that the WIOA Title II program has access to the data it needs.

Locally, Adult Education (ABE) providers have participants sign data sharing agreements so that information can be shared with CareerForce and workforce development partners. This enables ABE providers to electronically share intake data with other WIOA Title programs and partners when the participants are co-enrolling with other programs. This is especially common with ABE providers that are co-located with workforce development partners.

To enable data sharing at the state level, DEED and the Minnesota Department of Education develop a data sharing agreement for federal reporting, including determining co-enrollment with other title programs. Annually, Title II (Adult Education) shares data extracts with performance reporting staff at DEED. In addition, Title II data is shared with SLEDs to enable the measurement of cross-agency and cross-program outcomes.

Beginning July 1, 2024, multiple divisions of Children and Families Services, currently within the Department of Human Services, will transition to a newly created Department of Children, Youth, and Families (DCYF). Minnesota's TANF program, Minnesota Family Investment Program (MFIP), will be administered from DCYF effective July 1, 2024. Minnesota Statute Chapter 70, Children and Families, Article 12, Sections 1 – 35 outlines this statutory change. This transition is expected to continue through July 1, 2025.

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

Currently, in Minnesota, seven of the 13 participating titles share the same management information system, Workforce One, which is described in more detail in other Sections of this Combined State Plan. Minnesota will continue to explore the possibilities of additional titles sharing the same management information system.

With the restructuring of the DEED's Performance Technical Management team, the WIOA State Plan Dashboard is evolving. Enhancements to this data tool, designed to track performance by race, gender and other factors, are pending.

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 GWDB, through its functions under WIOA, will continue to study the existing management information system to ascertain the practicality and functionality of such a broad-based system and make a recommendation to the Governor. This includes through the implementation of the state's third goal around innovative service delivery. Over the course of the coming year, the GWDB, in partnership with CareerForce, Workforce One, local partners, and others will come together to identify specific strategies to provide better service to all customers through improved technology and data systems.

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

Minnesota has dedicated program performance and information technology staff to develop and produce the reports required for performance accountability. All programs underwent a substantial review and revision to align data elements, data collection and reporting to the WIOA requirements. This work continues, as needed, when new US DOL guidance is provided.

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.

Under Minnesota statute 116L.98, the Minnesota legislature has required specific and long-term performance indicators of state-funded workforce training programs, known as the Uniform Outcome Report Card. The report to the legislature must contain participant information by education level, race and ethnicity, gender, and geography, and a comparison of exited participants who completed training and those who did not.

These indicators include:

1. the total number of participants enrolled;
2. the median pre-enrollment wages based on participant wages for the second through the fifth calendar quarters immediately preceding the quarter of enrollment excluding those with zero income;
3. the total number of participants with zero income in the second through fifth calendar quarters immediately preceding the quarter of enrollment;
4. the total number of participants enrolled in training;
5. the total number of participants enrolled in training by occupational group;

6. the total number of participants that exited the program and the average enrollment duration of participants that have exited the program during the year;
7. the total number of exited participants who completed training;
8. the total number of exited participants who attained a credential;
9. the total number of participants employed during three consecutive quarters immediately following the quarter of exit, by industry;
10. the median wages of participants employed during three consecutive quarters immediately following the quarter of exit;
11. the total number of participants employed during eight consecutive quarters immediately following the quarter of exit, by industry;
12. the median wages of participants employed during eight consecutive quarters immediately following the quarter of exit;
13. the total cost of the program;
14. the total cost of the program per participant;
15. the cost per credential received by a participant; and
16. the administrative cost of the program.

DEED's agency-wide performance staff has already integrated WIOA programs into the Uniform Outcome Report Card.

State law also requires a workforce program net impact analysis to include the impact of workforce services on individual employment, earnings and public benefit usage outcomes and a cost-benefit analysis for understanding the monetary impacts of workforce services from the participant and taxpayer points of view.

Finally, DEED submits workforce training and UI wage records to the Minnesota Statewide Longitudinal Education Data System (SLEDs), which links secondary and postsecondary education and workforce to identify the most viable pathways for individuals in achieving successful outcomes in education and work. Through access to a secure data mart, the performance management team at DEED is able to access more robust data on WIOA – and other state workforce – program participants who enter, persist and complete postsecondary education after exiting when program tracking typically commences.

The Minnesota Adult Education (ABE) system creates a unique report card for its grantees that focuses on measurable skills gains, learner retention, and post-testing rates. This ABE annual report card is developed by the state ABE database and the Minnesota Department of Education. The ABE report card connects with both the ABE Assessment Policy and the Program Improvement Policy, giving grantees a chance to compare outcomes and helping to identify grantees that need additional support.

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.)

Minnesota's workforce development and unemployment insurance (UI) programs are both housed within DEED. This helps facilitate secure access to Minnesota wage detail data for the completion of official performance reporting requirements as required by federal or state laws. Minnesota's performance and information technology staff coordinate the extracts from Minnesota UI and State Wage Interchange System (SWIS) data to produce performance accountability reports under WIOA. Under a data sharing agreement, DEED also supplies Minnesota UI wage records to the Minnesota Statewide Longitudinal Education Data System (SLEDs) for tracking student pathways from high school, postsecondary completion and into the workforce. Public reporting on the SLEDs website shows aggregate outcomes for high school students who do not enter college in the first year after high school graduation, but instead enter the workforce. Expanded postsecondary employment and wage outcomes reporting is also available at the institution level by programs of study (i.e., major) and award type. DEED also leverages SLEDs postsecondary program completers and Minnesota UI data linkages for Eligible Training Providers reporting (ETA-9171).

DEED has studied relevant and timely issues on graduate employment and wage outcomes in Minnesota:

- Employment and wage outcomes of Minnesota workers who were laid off during the COVID-19 recession including racial disparities in employment outcomes.
- Employment and wage outcomes of students who participated in Career and Technical Education (CTE) in high school including how different CTE programs compared and how post-secondary education impacted earnings.
- Regional economic factors in shaping college graduate's decisions to stay or leave the region in which they graduated. Other worker mobility analyses include workers decisions to switch employers during the period of the "great resignation" following the COVID-19 recession.
- An analysis of which programs at different degree levels offer the best wage outcomes when compared to program cost.

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.

DEED relies on data to operate its programs and provide services. The public has a right to know about DEED activities and to protect their own individual privacy. Federal and state data practices laws and rules balance these rights and responsibilities. Compliance with federal and state laws, including the Minnesota Government Data Practices Act, which govern the protection of private data on individuals is and remains a priority for DEED.

We, therefore, take the following safeguards:

- Participants who are asked to provide data about themselves that is not public will be given notice through a Tennessee Warning, with written consent required when we need to use or release private data for specific purposes not explicitly authorized by statute.
- Only staff responsible for delivering and reporting on employment and training services are authorized recipients of nonpublic data, with access to systems to track, monitor or

view program data containing personally identifiable information restricted to those who have been determined by internal DEED staff to require access.

- Workforce One (WF1), which tracks WIOA program data, grants user permissions based on role in relation to data subjects, thereby preventing users from accessing data which does not belong to them or otherwise pertain to relevant clients.

As DEED submits both workforce training participant and Minnesota Unemployment Insurance (UI) wage detail to Minnesota's Statewide Longitudinal Education Data System (SLEDs), we also fully understand and comply with confidentiality requirements as required by Family Educational Rights and Privacy Act (FERPA) and State and Federal UI Confidentiality Laws and Regulations.

Data on individuals intended for public use is reported in aggregate form, meaning outcomes are only disclosed for groups of 10 individuals or more. No personally identifiable data on individuals, including Social Security Numbers, are shared publicly.

7. PRIORITY OF SERVICE FOR VETERANS.

A. DESCRIBE HOW THE STATE WILL IMPLEMENT THE PRIORITY OF SERVICE PROVISIONS FOR COVERED PERSONS 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.

B. DESCRIBE HOW THE STATE WILL MONITOR PRIORITY OF SERVICE PROVISIONS FOR VETERANS.

C. DESCRIBE THE TRIAGE AND REFERRAL PROCESS FOR ELIGIBLE VETERANS AND OTHER POPULATIONS DETERMINED ELIGIBLE TO RECEIVE SERVICES FROM THE JOBS FOR VETERANS STATE GRANTS (JVSG) PROGRAM'S DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALIST/CONSOLIDATED POSITION.

A. Implementing Priority of Service Provisions Compliance

Minnesota will provide priority of service to all employment and training programs that are funded in whole or in part by the Department of Labor. Minnesota CareerForce system ensures the provision of priority of service in the following:

- At the entry point of all one-stop centers (AJC) also branded as CareerForce locations. Staff is trained to screen and identify potential covered persons. Entry point staff asks customers if they have served in the U.S. military.
- To ensure that CareerForce reception staff is well versed in the priority of service, staff received the WIOA JVSG Desk Reference flyer, and they were also invited to participate in the online training or instructor-led training provided by the National Veterans Training Institute (NVTI) geared toward educating one-stop staff about the veterans service and priority of service.
- LVERs train and update local CareerForce staff and management on the provisions of POS.
- Point of Entry - signage at all CareerForce locations advises Veterans and other eligible persons of priority of service (POS). Information on Priority of Service is also provided during various program orientations, by staff, and during workshops.

- POS is highlighted on our customer-facing website <https://www.careerforcemn.com/>
- CareerForce locations have designated one of their computers as reserved for Veterans and spouses.
- All workshops will have open slots available to Veterans up to the day the workshop is scheduled.
- State Job Bank — Veterans and current and former Military members are able to identify themselves as such and are listed at the beginning of searches done by recruiters and employers. Employers are also able to self-designate as "Veterans Friendly Employers" so that Veterans can do keyword searches to find employers seeking Veterans for hire.
- ~~Veterans Employment Eligibility Screening Form~~~~Veterans Questionnaire – Veterans Employment Eligibility Screening Form~~~~Veterans Questionnaire~~ is available at the reception area and is given to all customers who self-identify as veterans or eligible persons.
- ~~Veterans Employment Eligibility Screening Form~~ is ~~The questionnaire is a tool used to identify Veterans eligibility with significant employment barriers.~~ This questionnaire is also available online on the Veterans Resources landing page on the CareerForceMN.com website: ~~<https://careerforce.mn.gov/forms/MNVets>~~~~<https://www.careerforcemn.com/veterans>~~

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B. Monitoring Priority of Service Provisions for Veterans

Priority of Service is monitored by the State Veterans Services Director in collaboration with CareerForce management to ensure priority of service is provided in all Minnesota CareerForce locations.

Monitoring activities include on-site visits, interviews with staff, and regular reviews of local office plans, and if available policies related specifically to "Priority of Service for Covered Persons." USDOL will also conduct visits and federal audits, as scheduled. The JVSG staff submit Quarterly Managers Reports to the local office managers that identify Priority of Service for Covered Persons and will identify issues and resolutions to Priority of Service as necessary.

Local Veterans Employment Representatives (LVER) staff provides ongoing training to CareerForce staff and partners statewide to ensure a successful implementation and understanding of Priority of Service for Covered Persons.

In addition, LVER staff reviews how Priority of Service is being implemented within each of the Minnesota CareerForce locations in their respective regions and offers guidance on how/where to improve Priority of Service efforts if necessary. The goal is to make certain that local CareerForce front desk staff is well versed on veteran priority of service.

C. ~~The triage screening~~ and Referral Process for Eligible Veterans and Other Populations

~~Veterans Employment Eligibility Screening Form~~~~Veterans Questionnaire~~ – The Minnesota Veterans Questionnaire is given to Veterans to assist reception area staff in identifying Veterans with significant barriers to employment. This questionnaire is also available online on the Veterans Resources landing page on the CareerForceMN.com website: ~~<https://careerforce.mn.gov/forms/MNVets>~~~~<https://www.careerforcemn.com/veterans>~~.

Non-JVSG staff conducts the ~~triage~~ screening by reviewing the questionnaire responses. We ask all customers who come to the CareerForce locations if they ever served in the US Military. If the answer is yes, we ask them to complete the Veterans Questionnaire. Non-JVSG partner staff does the initial ~~triage~~ screening/assessment, reviews the questionnaire, and makes appropriate referrals based on the responses to the questionnaire.

The JVSG staff is trained and instructed not to perform intake duties or point-of-entry functions normally assigned to other CareerForce partner staff.

Veterans with Significant Barriers to Employment (SBE)— All veterans determined to have ~~SBE barrier to employment~~ will be referred to DVOP to receive individualized career services or in the absence of the DVOP, a designated individualized career services provider. Veterans are eligible for DVOP services if they meet the criteria for having a significant barrier to employment or if they are designated as a special population.

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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.) regarding 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.

DEED meets its ongoing obligation not to discriminate on the basis of disability by developing system wide policy and procedure initiatives that comply with Section 188 of WIOA. These policies include physical and programmatic accessibility of facilities, programs, services, technology, and materials to serve the needs of customers with disabilities.

DEED's WIOA Equal Opportunity Manual, Chapter 5.1 explains that all recipients of WIOA Title I funds have an affirmative obligation not to discriminate based on disability. The overarching principle of federal disability nondiscrimination law is that people with disabilities must be treated as individuals, not based on assumptions and stereotypes about their disabilities. All recipients of WIOA Title I funds are prohibited from discriminating in the registration for and the provision of aid, benefits, services, or training, including core, intensive training, and support services, based on disability. No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of, or in connection with, any such program or activity, based on disability. Under this principle, recipients are required to focus on the skills, strengths, and abilities of a particular customer or employee with a disability, and to provide reasonable accommodations/modifications and the auxiliary aids and services that the customer or employee needs to utilize their skills, strengths, and abilities. Recipients should not focus on the limitations caused by the customer's or employee's disability.

The Determining the Location policy requires that CareerForce locations in Minnesota will be accessible to all populations including individuals with disabilities. The Office of Diversity and

Equal Opportunity is the final authority in determining if a location meets the accessibility criteria to be certified as a CareerForce location.

The Minnesota CareerForce location System Certification Standards policy provides guidance on the implementation standards for the equal access obligations under WIOA. CareerForce locations must be universally accessible to all populations including but not limited to various racial and ethnic groups, persons for whom English is not their first language, ex. Justice-involved individuals, people who are houseless, Veterans, various age groups, different genders, and individuals with disabilities.

DEED's WIOA Equal Opportunity Manual also addresses programmatic accessibility and state that all WIOA Title I – financially assisted programs and activities must be programmatically accessible, which includes:

- Providing reasonable accommodations for qualified 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.
- Providing appropriate auxiliary aids or services free of charge, including assistive technology devices and services, where necessary so individuals with disabilities have an equal opportunity to participate in, and enjoy the benefits of the program or activity.
- Allowing service dogs to accompany people with disabilities in all areas of the facility where the public is normally allowed to go.

DEED's Americans with Disability Act Title II policy PPM 423, states, "In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, as amended (ADA), Section 188 of WIOA, and the Minnesota Human Rights Act, DEED will not discriminate against qualified individuals with disabilities based on disability in its services, programs, products, or activities.

The policy applies to all employees of the Minnesota Department of Employment and Economic Development (DEED), and third parties who have business interactions with DEED. In addition, DEED partners that receive federal financial assistance must meet their accessibility obligations under Section 504 of the Rehabilitation Act and the implementing regulations at 29 CFR part 32.

Provide Architectural Accessibility for Individuals with Disabilities

The CareerForce location System provides integrated program services through the development and maintenance of an accessible environment. All facilities open to the public as well as administrative offices must be accessible to and useable by the broadest population. All partners are covered by Title II of the ADA and the equal opportunity and nondiscrimination elements of Section 188 of WIOA and, therefore, are subject to the same set of standards.

The Determining the Location policy states, "DEED must ensure that all services are compliant with applicable laws, regulations and policies. DEED may, therefore, withhold certification and/or funding from a location that does not meet the criteria established in this and related policies and laws." The Policy goes on to state, "the CareerForce location will be accessible to all populations including individuals with disabilities.

The Section of the Policy titled Minnesota CareerForce location System Certification Standards provides detailed information regarding the criteria and the process for selecting, remodeling or moving a CareerForce location. CareerForce locations must meet the standards set forth in the Policy. The Policy identifies the tools used to assist in evaluating and determining access requirements. They include:

- The site and building element descriptions are intended to help determine if a site location has the most basic accessible features to ensure equal access to participants with disabilities. If the site does not have the required features, modifications can be made to create improved access. It is imperative that a review be conducted prior to lease negotiations so that access issues can be addressed and remediated.
- It is the responsibility of DEED and its partners to choose sites that are accessible to and usable by the broadest population. DEED, as the designated state agency for WIOA implementation, is responsible for oversight and implementation of access standards regardless of the WIOA entity that holds the lease.
- During site reviews, the ADA Checklist for Existing Facilities is used. The checklist is based on the 2010 ADA Standards for Accessible Design. The Institute for Human Centered Design and the ADA National Network developed the checklists. Using the checklists, a comprehensive review is done on sites, including approach and entrance, access to goods and services, toilet rooms, and additional access.

DEED developed a review schedule for all Comprehensive CareerForce locations. Site visits for recertification of the 50 CareerForce locations are scheduled on a three—year cycle. Comprehensive CareerForce locations that are newly developed, remodeled or relocated are included in the review and are prioritized. There is generally an eighteen-month lead time on remodeling or relocation.

Affiliate CareerForce locations are required to provide full access and opportunities to all job seekers including serving individuals with disabilities. Physical locations, services and programs must comply with Section 188 of WIOA and provisions of the American with Disabilities Act of 1990, as amended.

DEED will work closely with Affiliate CareerForce locations to have them provide an annual assessment on architectural and programmatic accessibility for individuals with disabilities. A review schedule for Affiliate CareerForce locations will occur during Program Monitoring Visits.

Provide Programmatic Accessibility for Individuals with Disabilities

All DEED and its partners CareerForce locations programs and activities must be programmatically accessible, which includes 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 individuals with disabilities as effectively as with others and providing appropriate auxiliary aids or services, including assistive technology devices and services, where necessary so individuals with disabilities have an equal opportunity to participate in, and enjoy the benefits of the program or activity.”

DEED has developed a variety of methods to ensure that its programs and activities are universally accessible to individuals with disabilities. They include:

- The Minnesota CareerForce location System Certification Standards described earlier identifies both physical and programmatic accessibility requirements. Customers with disabilities must be able to participate and benefit from the services available in the CareerForce location System, as do all customers. In addition to the site accessibility standards, the Policy identifies the following requirements:
- Development of an evacuation and safety plan
- Notice displayed and available in alternate formats upon request
- Inclusion of tag lines
- Identification of Minnesota Relay
- Availability of accommodation and modifications
- Staff knowledge of assistive technology
- Use of auxiliary aids and services
- Community resources
- Complaint processes
- Technology standards have been developed for all CareerForce locations
- A variety of assistive technologies are available in CareerForce locations

Assistive technology in CareerForce locations include such things as JAWS and ZoomText software, pocket talkers, and UbiDuos. DEED is currently in the process of determining which required AT equipment will be required in both comprehensive and affiliate sites. DEED's Policy and Procedure Manual (PPM 215), Office Identification Policy includes requirements for interior signage. The policy provides information on character proportion, character height, raised/Brailed characters, contrast, placement height and pictorial symbols.

All CareerForce location staff must be trained in and promote the use of Minnesota Relay or a customer's preferred relay service. A relay service is used to effectively communicate with individuals who have speech, hearing, or other disabilities.

Are Able to Communicate with Individuals with Disabilities as Effectively as with Others

Public entities are required to ensure that applicants, participants and members of the public with disabilities have communication access that is equally as effective as that provided to people without disabilities.

All printed communications provide contact information for a person with a disability to request the information in an alternative format.

When developing, purchasing, maintaining, or using electronic and information technology, DEED and its partners must utilize electronic and information technologies, applications, or adaptations which: 1) Incorporate accessibility features; 2) Are consistent with modern accessibility standards, such as Section 508 Standards (36 CFR part 1194) and W3C's Web Content Accessibility Guidelines (WCAG) 2.0 AA; and (3) Provide individuals with disabilities access to, and use of, information, resources, programs, and activities that are fully accessible, or

ensure information provided by the electronic and information technologies are provided to individuals with disabilities in an equally effective and equally integrated manner.

MN.IT's Office of Accessibility provides services and technical support to the State of Minnesota executive branch. MN.IT has set standards for IT Accessibility. On their website a page is devoted to accessibility information for state agencies. It includes information on creating electronic documents, an information implementation toolkit for accessibility, and tools, training and testing information for creating accessible videos, podcast and webinars.

DEED's Workforce Coordination Training Team is able to provide on-demand training for all CareerForce location staff and partners. These trainings can be in person or webinar based depending on the topic and need.

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. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

DEED has a Language Access Policy, which follows the guidance set by the U.S. Department of Justice concerning language access for individuals in all DEED programs and services.

The DEED WIOA Equal Opportunity Manual 5.2: Providing Language Access states that it is the policy of DEED to ensure equal access to WIOA Title I services for limited English and non-English speaking customers. All recipients of WIOA Title I funds have an affirmative duty to take reasonable steps to provide services and information in languages other than English so that limited English proficient (LEP) are effectively informed about and/or can participate in the program or activity.

Local Areas are required to take reasonable steps to ensure that LEP individuals have meaningful access to their programs and activities. Reasonable steps may include but are not limited to the following:

- Conducting an assessment of an LEP individual to determine their language assistance needs.
- Providing oral interpretation or written translation of both hard-copy and electronic materials, in the appropriate non-English languages, to LEP individuals when requested.
- Conducting outreach to LEP communities to improve service delivery in needed languages.

Minnesota's One-Stop system addresses the needs of ELL clients in a variety of ways:

- Each CareerForce location attempts to hire staff that reflect the local community. When filling vacant positions, the CareerForce Division's Job Service team prefers candidates to be bilingual in language that their customers speak including non-English languages spoken in the area. For example, Somali-speaking staff are housed in the Minneapolis, St. Paul, and St. Cloud, Burnsville, and Willmar CareerForce locations where Somali communities are growing.

- Every CareerForce location has an account with Language Line Translation Services. CareerForce locations can access translation services via phone, video remote, or on site in 290+ languages.
- Every CareerForce location is knowledgeable of community-based organizations who specialize in serving LEP learners. The local Adult Basic Education (ABE) provider offers English language classes in every region of the state and is often one of the first referral sources.
- There are also community-based organizations in larger communities that are an important partner and referral source for the One-Stops.
- DEED targets areas of the state with significant populations of LEP clients by investing existing resources in those areas. For example, additional Wagner Peyser funding is provided to the Minneapolis and St. Cloud CareerForce locations so they can employ a Community Liaison Representatives for the Afghan evacuee community. This is an individual who speaks the local languages of the community he serves. DEED invested significant WIOA and Wagner Peyser resources into a new One-Stop in North Minneapolis that houses all WIOA programs, adult and K-12 education programming, and a community health care clinic to better serve the growing LEP population.
- Top-level content on CareerForceMN.com is translated into Somali and Spanish.

DEED and its partners already collect the preferred language of each applicant, registrant participant, and terminatee, which is a requirement for all states. For languages spoken by a significant number or portion of the population eligible to be served, or likely to be encountered, vital information will be translated into those languages and made readily available in hard copy, upon request, or electronically.

The State has a policy and procedure that provides guidance to local areas on serving public assistance recipients and other low-income individuals. This policy establishes a broad guideline for local judgment of those participants who are “most in need” and require a service plan and outreach process to serve this population.

Local providers must establish a system of prioritizing the enrollment of participants and delivery of services in times of limited availability of State and/or Federal resources.

Local providers must write and implement a policy outlining a priority of service policy and include the criteria impacting this policy in annual planning documents required by DEED. The criteria should apply to all dislocated workers and adults served and ensure availability of program services throughout the program year for those who meet the local priority of service.

Local providers should determine priority on an individual basis. Staff members with the local provider may determine an individual’s “most in need” status based on their unique factors and barriers. Local providers should intervene early with eligible customers. DEED monitors these activities through our client data system to ensure this priority is addressed. The outcomes of these efforts become a part of monitoring reports.

The State (DEED) implements an annual monitoring schedule on all Federal grants to ensure that local areas are following and implementing the required Federal and/or State policies relevant to the grants being executed. A part of the monitoring process is ensuring that local areas are enrolling participants based on priority of service. Local areas are also required to provide the State a copy of their priority of service policy. If they do not have one in place, they

have the option to follow the DEED's Priority of Service Policy and inform the State of such decision.

During monitoring, monitors ensure that priority is given based upon the priority of service outlined in DEED's WIOA Equal Opportunity Policy Manual Chapter 5.0 Affirmative Outreach requires that state and local-level recipients conduct affirmative outreach to ensure that they are providing equal access to their WIOA Title I-financially assisted programs and activities. Affirmative outreach means ensuring that an equivalent level of information regarding aid, benefits, services, and training is provided to all populations of eligible participants. These steps should involve reasonable efforts to include members of the various groups protected by WIOA regulations including but not limited to persons of different sexes, various racial and ethnic/national origin groups, various religions, individuals with limited English proficiency, individuals with disabilities, and individuals in different age groups.

DEED's WIOA Adult Eligibility and Priority of Service Policy (<https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=508>), with first priority going to Veterans and eligible spouses who are low income or recipients of public assistance or who are basic skills deficient.

Additionally, DEED will also be updating the case management system to allow staff to pull and monitor this data efficiently. Furthermore, DEED will continue to ensure that local areas have updated strategic plans, policies and procedures implementing priority of service to ensure that at least 75% of the participants in the Adult program are from at least one of the priority groups as outlined in TEGL 7-20.

English learners are addressed in both state and federal legislation. The Civil Rights Act of 1964 initially determined that students limited in English language proficiency have a right to a language instruction educational program that provides them access to the academic content instruction that all children receive. Court decisions and guidance from the Office for Civil Rights with the United States Department of Education have described in more detail the responsibilities of school districts. The Elementary and Secondary Education Act reauthorized under Every Student Succeeds Act (ESSA), delineated more specifically the responsibilities of schools, districts, and states to ensure that ELs become proficient in English and meet the same challenging state academic standards as expected of their English-only peers.

The ESSA provides an opportunity to meaningfully include and support English learners. In the past, Minnesota did not mandate statewide EL entry and exit criteria or procedures. However, as part of ESSA implementation, states are required to develop and implement standardized entry and exit criteria and procedures. For more information on the laws, regulations and court cases surrounding the needs of ELs, see the English Learners in Minnesota Report at <https://education.mn.gov/MDE/dse/el/>.

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.

Plan Development

WIOA Combined State Plan Program Administrators began meeting on a quarterly basis in May 2023 in preparation for submitting the next four-year WIOA State Plan. State Program

Administrators collaborated with the State Board and each other via a SharePoint platform that was set up in September 2023, specifically for planning and coordination. Shortly thereafter, 2024-2027 State, Regional and Local Plan Guidance was released to align planning efforts across the workforce development system in Minnesota.

Several hundred workforce development partners attended Minnesota's Inaugural Workforce Summit at DEED Headquarters in St. Paul on September 20, 2023. Due to the overwhelming success of this event, plans are currently underway for the second annual summit in Fall 2024.

The GWDB convened representatives from the Minnesota Association of Workforce Boards (MAWB), State Program Administrators from WIOA titles I-IV, as well as State Program Administrators from each of the combined partner programs including TANF, Perkins V, Department of Corrections, and Jobs for Veterans State Grant (JVSG). This team assisted in determining the strategic planning process for the development of the WIOA State Plan. Further planning sessions were conducted to review progress, address strengths and weaknesses of the workforce development system, and develop processes for ongoing implementation of the State Plan following implementation. A Special Committee made up of GWDB members had an opportunity to review and comment on the plan prior to publication for public comment. Consensus to put forth approval of the State Plan is expected at the next quarterly business meeting of the GWDB on Wednesday, Feb. 28, 2024.

[For the State Plan modification, the GWDB continued to convene Program Administrators and plan for the modification. The GWDB had voted on the 2025 and 2026 meeting schedule in 2024, and Program Administrators have been directed by the GWDB to have contributions for the plan ready for the February 11, 2026 GWDB vote. Without formal guidance from the USDOL and USED, the GWDB directed Program Administrators to follow guidance in the State Plan Information Collection Request \(ICR\) and "modifications to the plan to reflect changes in labor market and economic conditions or in other factors affecting the implementation of the State plan" as is required under WIOA.](#)

[The timeline for the State Plan modification is as follows:](#)

[**January 16, 2026:** All modifications should be uploaded to the WIOA SharePoint.](#)

[**January 22 – February 6:** Draft Modification submitted for Governor's Review.](#)

[**January 26:** U.S. Department of Labor and U.S. Department of Education issue formal guidance for State Plan Modifications](#)

[**February 11:** GWDB Meeting to approve the Modified State Plan for Public Comment \(final adjustments allowed\). Deadline for submitting Subsequent Designations & Board Certifications for LWDBs \(if needed\). A draft of the **WIOA State Plan 2026 Modification** is posted for public comment at <https://mn.gov/deed/gwdb/priorities/wioa/>.](#)

- [Public comments on this document can be sent to \[gwdb.deed@state.mn.us\]\(mailto:gwdb.deed@state.mn.us\) by **March 16, 2026**, when the Governor's Workforce Development Board \(GWDB\). If approved by the GWDB, these updates will be submitted to the U.S. Department of Labor for review. Comments received after March 16 will still be tracked by GWDB staff.](#)

[**March 3:** All states must submit their expected levels of performance into the WIOA State Plan Portal.](#)

[**March 16-27:** Final revisions incorporated based on Public Comment & Governor's Office input.](#)

[March 31: Final Combined State Plan Modification submitted to the U.S. Department of Labor via WIOA State Plan Portal.](#)

Implementation

Minnesota believes that coordination among State Plan partners for implementation of the 2024-2027 WIOA State Plan is critical to success in achieving its vision. To that end, the GWDB will create and monitor a dynamic community engagement plan for the WIOA Plan over the next four years. This will include interdepartmental and interagency state staff, businesses, local and regional workforce development boards, communities of color and indigenous people, people with disabilities, and community-based organizations. During implementation activities, Minnesota will further identify areas of growth and development for strengthening the statewide workforce development system.

This coordination plan will be developed early following the adoption of the WIOA 2024-2027 State Plan. Joint planning and coordination are anticipated to be inclusive of interested entities and multidimensional as indicated below:

- Input from community engagement sessions and public comment on the WIOA 2020 State Plan will be incorporated as a basis for implementation and initial identification of areas for growth.
- High-level monthly workforce development discussions including Deputy Commissioners from across Minnesota State Departments will be aligned with State Plan goals.
- State Program Administrators from across Minnesota state agencies and including representatives from the local boards will continue to meet quarterly to discuss implementation progress, identify areas for development and growth, and ensure agreement on impact measures.
- Ongoing state-wide community outreach and engagement will be implemented in partnership with businesses, local and regional boards, Community-based organizations, Tribal communities, refugee and immigrant communities, and other stakeholders and organizations.
- Results of the work will be presented to the GWDB on a quarterly basis.

Timeline for Implementation

March 2024 - August 2024:

- Community Outreach and Engagement: The Director of the GWDB, the CareerForce Director, the Director of the Equal Opportunity Office, the Office of Public Engagement and Government Affairs will develop a statewide community engagement plan with input from MAWB. This plan will focus on gaining input specifically tied to Minnesota's vision, goals, and strategies.
- The GWDB will formalize State Plan coordination and determine a timeline for planning, review, and submission of the two-year Plan Modification in 2026.

September 2024-December 2025:

- State agency leaders, program administrators and other workforce development partners will gather to review community input, discuss WIOA Plan implementation progress, and determine strategies for continuous improvement and growth.
- Quarterly updates regarding progress will be presented to GWDB members, as well as the MAWB Operations Committee.
- WIOA State Plan coordination strategies and alignment will be shared with Deputy Commissioners from across Minnesota State Departments.

January 2025:

- The GWDB, WIOA Program Administrators, and MAWB Executive Directors and Local Workforce Development Chairs will jointly create a schedule for ongoing WIOA State Plan 2024-2027 coordination work and planning for future State and Regional Plans.

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 administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the	Yes

The State Plan must include	Include
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;	
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant	Yes

The State Plan must include	Include
Barriers to Employment ~~(SBE)~~ to DVOP services, when appropriate; and	
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

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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

The following is a list of the six regions created in Minnesota and the associated local workforce development areas (LWDA):

- Region 1: LWDA 1 ([Inter-County Community](#) Council); LWDA 2 (Rural MN CEP);
- Region 2: LWDA 3 (NE MN Office of Job Training); LWDA 4 (City of Duluth);
- Region 3: LWDA 5 (Central MN Job & Training Service); LWDA 17 (Career Solutions);
- Region 4: LWDA 9 (suburban Hennepin and Carver Counties); LWDA 10 (Minneapolis Employment and Training); LWDA 12 (Anoka County Job Training Center); LWDA 14 (Dakota & Scott Counties); LWDA 15 (Ramsey County— Workforce Solutions); LWDA 16 (Washington County);
- Region 5: LWDA 6 (SW MN Private Industry Council); LWDA 7 (South Central Workforce Council/MN Valley Action Council)
- Region 6: LWDA 8 (SE MN Workforce Development, Inc.); LWDA 18 (Winona County Workforce Council)

B. DESCRIBE THE PROCESS AND POLICY USED FOR DESIGNATING LOCAL AREAS, INCLUDING PROCEDURES FOR DETERMINING WHETHER THE LOCAL AREA MET THE CRITERIA FOR “PERFORMED SUCCESSFULLY” AND “SUSTAINED FISCAL INTEGRITY” IN ACCORDANCE WITH 106(B)(2) AND (3) OF WIOA. DESCRIBE THE PROCESS USED FOR IDENTIFYING REGIONS AND PLANNING REGIONS UNDER SECTION 106(A) OF WIOA. THIS MUST INCLUDE A DESCRIPTION OF HOW THE STATE CONSULTED WITH THE LOCAL BOARDS AND CHIEF ELECTED OFFICIALS IN IDENTIFYING THE REGIONS

The designation of the local areas followed the requirements in WIOA. The State, through review and consultation with the Minnesota Association of Workforce Boards, which represents the chief elected officials and the private sector leadership of the local boards, accepted requests for initial designation of all 16 existing local areas, based on satisfactory performance and sustained fiscal integrity. Satisfactory performance was defined as meeting or exceeding performance standards for the two most recently completed program years. Sustained fiscal integrity as defined as having no audit exceptions for the two most recently completed program years. Documentation included published performance reports and audit letters issued by the State of Minnesota. Opportunities for public comment on the State plan specific to the designation of local areas occurred at local area board meetings, a State board meeting, regional listening sessions and the 30-day public comment period published in the State Register.

The designation of regions followed the requirements in WIOA. The State, through review and consultation with the Minnesota Association of Workforce Boards, which represents the chief elected officials and the private sector leadership of the local boards, considered various options based on the criteria contained in WIOA law. Additional criteria included having one metropolitan statistical area in each region and the partnering of two or more local areas. Other considerations, based on feedback from local boards and economic development regions in the state, was to keep existing boundaries intact, as to not require local boards or existing regional economic development regions to engage in multiple regional planning efforts, stressing their resources and capacity to fully participate. The proposed regions were approved by the GWDB and MAWB and adopted in 2015. Opportunities for public comment on state plan specific to the designation of local areas occurred at local area board meetings, a state board meeting, regional listening sessions and the 30-day public comment period.

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

Subsequent to initial designation, any local unit of government, including a combination of such units, may appeal the State's decision to not grant designation as a local area. The basis for not granting designation is presumed to be failure to satisfactorily perform or failure to not maintain sustained fiscal integrity. The State must provide technical assistance to the local area to address performance or fiscal integrity issues before such action can be taken.

Any local unit(s) of government may also be denied subsequent designation based on not meeting the State criteria for regional planning, as outlined in section 106(c)(1) in WIOA, as articulated in the State Combined Plan and any planning guidance issued to local areas. The State must provide technical assistance to the local areas within the region to address regional planning issues before such action can be taken.

Following the course of action that denies local designation, the appeals process will allow for the local unit(s) of government to present their appeal to the Governor's Workforce Development Board. The State Board will make a recommendation to the Governor. If the determination is not satisfactorily resolved with the Governor's decision, the local unit(s) of government may appeal to the Secretary of Labor. See DEED Policy and Guidance site:

<https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=505>

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

WIOA requires an infrastructure funding policy to support the CareerForce (One-Stop) delivery system. Minnesota has had such a policy in place since 2010. ~~for operations of the 50 CareerForce Locations.~~ This policy uses general customer, participant and staffing data to determine the proportional benefit that each title derives from the shared services now known as “Career Services” under WIOA. All infrastructure funding is borne by the local budgets of service providers. This policy includes a dispute resolution process based on regulation 678.700, allowing the local partners to appeal the infrastructure funding dispute to the Governor’s Workforce Development Board, who will review all documentation and recommend a resolution. If the resolution is not accepted, the state funding mechanism will be used.

2. STATEWIDE ACTIVITIES

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A. PROVIDE STATE POLICIES OR GUIDANCE FOR THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM AND FOR USE OF STATE FUNDS FOR WORKFORCE INVESTMENT ACTIVITIES

DEED oversees the administration of the WIOA titles IB, III and IV. As the administrator of these titles, the department issues policy and guidance and maintains a publicly accessible database of policies at <https://apps.deed.state.mn.us/ddp/PolicyList.aspx>. Policy and guidance covers all areas of department operated core partner titles and additional titles, and includes the following categories of policy: Equal Opportunity & Complaints; Administration & Operations; Multi-Program Administration Requirements; One-Stop Centers; WIOA Adult, Dislocated Worker and Youth; Wagner-Peyser Employment Service Program; Vocational Rehabilitation Services; Displaced Homemaker; Foreign labor Certification; Migrant & Seasonal Farmworker; Senior Community Services Employment; Trade Adjustment Act; Work Opportunity Tax Credit; Minnesotaworks.net and new elements under WIOA. These policies have been updated, and several are in the process of continued review as TEGs are released and clarifying guidance is provided by DOL.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR’S SET ASIDE FUNDING FOR MANDATORY AND DISCRETIONARY ACTIVITIES, INCLUDING HOW THE STATE WILL CONDUCT EVALUATIONS OF TITLE I ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES.

Considerations for the use of Minnesota’s set aside will include but not limited to: Enhanced employer engagement and sustainability strategies, development of career pathways and pre-apprenticeships, development and ongoing support of technology infrastructure and systems enhancements, comprehensive sector specific WIOA youth and adult program development and administration, Governor’s Workforce Development Board and continued ~~of~~ support of local regional planning activities. Staff costs for those performing WIOA Title I Core Program Evaluations are also supported with these funds.

C. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS.

The Minnesota State Rapid Response Team (SRRT) within the Department of Employment and Economic Development (DEED) is dedicated to providing assistance to workers and businesses during periods of economic transition inherent to the business cycle.

Collaborating closely with impacted businesses and employees, between 3-1-2022 and 3-12-2024, Minnesota’s SRRT has actively engaged with over 387 businesses and their affected employees, addressing both small-scale and mass layoffs and closures. The SRRT received and

processed 41 Worker Adjustment and Retraining Notifications (WARNs), providing information and services to approximately 5,761 individuals. In total, the SRRT has served 15,147 individuals affected by layoffs and business closures.

Rapid Response initiatives involve strategic partnerships with ~~the Employer Engagement Team~~, Workforce Strategy Consultants (WSCs), Business and Community Development (BCD), the Unemployment Insurance (UI) Division, and local/regional partners. Early warning indicators of potential business layoffs or closures are provided through collaborative efforts. The SRRT's permissible activities include continuous engagement and relationship-building with businesses, funding and management of incumbent worker training programs, and analysis of supplier risks in the event of a business closure or production shift.

As part of its ongoing efforts, the SRRT has ~~executed~~~~implemented~~ a targeted Small Layoff Outreach initiative since the last Minnesota Workforce Innovation and Opportunity Act (WIOA) State Plan. This initiative aims to proactively inform local and regional partners, as well as individuals impacted by layoffs, about the Dislocated Worker program, irrespective of the scale ~~of layoffs~~ or closure of their business.

Furthermore, the SRRT has developed a comprehensive Layoff Aversion strategy, establishing an Early Warning Network to monitor, and forecast potential plant closures. This approach facilitates the timely implementation of response and prevention measures, ensuring a proactive stance toward economic transitions.

D. DESCRIBE THE STATE POLICIES AND PROCEDURES TO PROVIDE RAPID RESPONSES IN CASES OF NATURAL DISASTERS INCLUDING COORDINATION WITH FEMA AND OTHER ENTITIES.

Natural disasters are covered under the Governor's Executive Order which assigns emergency responsibilities to State agencies. Each agency has an Emergency Operations Plan that details their responsibilities and roles in coordinating with other state and federal agencies, as deemed necessary by the disaster event and declaration by the President to engage FEMA. The following is a high-level description of the role DEED plays in a disaster response:

The primary objective of ~~Minnesota's State Rapid Response Team (the SRRT)~~ is to proactively mitigate layoffs when feasible, minimize their impact on affected workers, and expedite the transition of dislocated workers to new employment opportunities. SRRT interventions address various scenarios, including business closures, mass layoffs (involving 50 or more workers), small layoffs (involving fewer than 50 employees), and layoffs resulting from both manmade and natural disasters.

Minnesota's ~~State Rapid Response Team (SRRT)~~ procedures for addressing natural or manmade disasters are designed to mitigate adverse economic and community impacts resulting from actual or imminent crises. These protocols emphasize maintaining effective communication, close coordination, and establishing strategic partnerships with key entities, including Minnesota Homeland Security and Emergency Management (HSEM) and FEMA when necessary.

In the event of a disaster, the SRRT leverages its partnerships with emergency management organizations (such as HSEM and FEMA), Chief Elected Officials (CEOs), local Chambers of Commerce, Economic Development Associations (EDAs), labor and industry organizations, and the U.S. Department of Labor (USDOL) to stay informed and provide timely assistance to

affected areas and workers. Additionally, collaborations with Minnesota's CareerForce locations and Local Workforce Development Boards (LWDB) enhance the team's capabilities.

The SRRT serves as a key convener in planning the state's disaster response and plays a crucial role in delivering reemployment and transition services to those impacted by disasters. The team ensures that the Minnesota Department of Employment and Economic Development (DEED) website and CareerForcemn.com are updated with essential information as needed.

These preparations, combined with flexibility and creativity in responding to unexpected events, enable the SRRT to quickly and effectively manage major events, providing critical support to communities, employers, and their employees.

Disaster Unemployment Assistance (DUA): DUA helps unemployed workers and self-employed individuals who are unable to work as a direct result of a major disaster, and if the individual is not eligible for other unemployment insurance benefits. DUA is administered by the Unemployment Insurance Division. For DEED to initiate DUA, the President must issue a disaster declaration providing for individual assistance. Individuals can apply for unemployment insurance benefits at www.umn.org or 1-877-898-9090.

Temporary CareerForce locations:

1. If a disaster strikes a community and a DEED CareerForce location is not available within close proximity, a temporary center may be opened. Services provided at the location would be for answering questions related to Disaster Unemployment Insurance, Dislocated Worker Services and the National Dislocated Worker Grant temporary employment. The logistics of a temporary center being opened would be handled in conjunction with Administrative and Financial Services' Facilities Coordinator.
2. Provide materials or representation at Disaster Recovery Centers (DRCs) and public meetings, as requested by the Division of Homeland Security and Emergency Management, to furnish information relative to disaster unemployment, dislocated worker, job training and applicable programs.

In the event of a natural disaster, where federal assistance is needed to supplement local efforts, National Dislocated Worker Grants (DWG) are awarded to states by the USDOL to temporarily expand the service capacity of the DW program by providing funding assistance in response to large, unexpected economic events with significant job loss. Minnesota has been awarded two National Dislocated Worker Grants.

National Dislocated Worker Grant (DWG) A DWG creates temporary employment to assist with clean-up on public land and infrastructure resulting from a natural disaster. Work under the NDWG program is administered by the Employment and Training Programs Dislocated Worker Unit. For DEED to initiate a DWG application, the President must declare a major disaster for public assistance. A NDWG is issued by the U.S. Department of Labor, lasts six months, and can provide up to \$12,000 to each eligible individual in wages. After a NDWG is awarded to DEED, Job Seeker Services sub-grants the funding to a local level project operator to implement activity within counties that had been designated by FEMA for public assistance. Individuals interested in employment through the NDWG would obtain information through their local CareerForce location.

States may qualify for a National Dislocated Worker Grant under WIOA law. There are two types and purposes of National Dislocated Worker Grants (DWGs) under sec. 170 of WIOA: Employment Recovery DWGs and Disaster Recovery DWGs.

Applications for Employment Recovery DWGs may be submitted at any time during the year and must be submitted to respond to eligible events as soon as possible when:

1. The applicant receives a notification of a mass layoff or a closure as a result of a Worker Adjustment and Retraining Notification (WARN) Act notice, a general announcement, or some other means, or in the case of applications to address situations described in § 687.110(a)(4), when higher-than-average demand for employment and training activities for those members of the Armed Forces and military spouses exceeds State and local resources for providing such activities;
2. Worker needs and interest in services has been determined through Rapid Response, or other means, and is sufficient to justify the need for a DWG; and
3. A determination has been made, in collaboration with the applicable local area, that State and local formula funds are inadequate to provide the level of services needed by the affected workers.

a. Applications for Disaster Recovery DWGs to respond to an emergency or major disaster must be submitted as soon as possible when:

- i. As described in § 687.110(b)(1), FEMA has declared that the affected area is eligible for public assistance;
- ii. A situation as described in § 687.110(b)(2) occurs. The applications must indicate the applicable Federal agency declaration, describe the impact on the local and/or State economy, and describe the proposed activities; or
- iii. A situation as described in § 687.110(b)(3) occurs, and interest in services has been determined and is sufficient to justify the need for a DWG.

E. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) AND ENSURES THE PROVISION OF APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A) AND TAA SECTION 221(A)(2)(A) .)THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE 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 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 AND HOW THE STATE WILL ENSURE THE PROVISION OF APPROPRIATE CAREER SERVICE TO WORKERS IN THE GROUPS IDENTIFIED IN THE PETITION (TAA SEC. 221(A)(2)(A)).NOTE: UNTIL THE TAA PROGRAM IS REAUTHORIZED, THE REQUIREMENTS TO PROVIDE RAPID RESPONSE AND APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A PETITION HAS BEEN FILED IS NOT APPLICABLE.

The Trade Adjustment Assistance (TAA) Program is a federal program that provides aid to workers who lose their jobs, or are at risk of losing their jobs, or whose hours of work and wages

are reduced as a result of foreign competition. TAA services are designed to help employees regain employment that is the same or better than the job they are at risk of losing or have actually lost. Once Rapid Response has been notified of an impending layoff or permanent closure due to jobs that will be moved overseas the SRRT notifies TAA. The employers will be provided information on filing a TAA petition and once approved the businesses employees will have a scheduled informational session either in-person or virtually. The State's Rapid Response Team will work alongside the TAA team and the local workforce service provider to cover information and services available to employees who have been approved for TAA program co-enrollment. Though co-enrollment is now mandated between the TAA Program and WIOA Dislocated Worker Program under the Final Rule, Minnesota has required co-enrollment with the Dislocated Worker (DW) program for many years. TAA created and distributed booklets and quick guides to all participants enrolled in TAA-funded training and their DW Counselors, called Navigating TAA Training. The information is offered in five (5) languages and posted online as a resource for participants in training and staff serving them <https://www.careerforcemn.com/TAA>. Additionally, Minnesota's TAA program shifted to a paperless environment and 100% of participant files are electronically stored. The shift saved materials, space, time, and promoted better coordination for staff to cover for each other during absences and staff transitions.

Starting in August 2020, the United States Congress did not reauthorize the Trade Act, which resulted in its current sunset stage. Minnesota continued to provide services to participants covered under a TAA petition filed and certified on or before June 30, 2022, and who enrolled by September 30, 2025. As of October 1, 2025, Minnesota is no longer accepting new TAA applications.

C. 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

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.

~~The COVID-19 pandemic exacerbated and amplified the racial inequities prevalent in employment and access to quality training. Even before the pandemic, inherent inequities in the labor market disproportionately affected young people and communities of color. Young adults from low-income backgrounds have lower employment rates and work in lower-paying jobs. In addition, Black and Latinx individuals are disproportionately represented among the low-wage workers and the unemployed. With the pandemic upending school operations and access to training for those with limited internet access, the long-term impact on underserved communities will be significant.~~ As the

State continues to ~~rebuild-strengthen~~ the economy, work-based training models will be a critical component ~~of the economic recovery~~.

The WIOA Adult and Dislocated Worker programs will continue to work closely with local Workforce Development Areas to promote work-based training models through the provision of a framework for local action. This framework ensures compliance with federal regulations and state policies that provide guidance to local areas in establishing processes that are data driven. Local areas collect, evaluate, and track their progress against determined goals as well as alignment with local demand.

Many local areas have processes and key personnel assigned to perform employer outreach in order to establish work-based training models that best fit their customers' needs. Local areas continue to create partnerships with various stakeholders including training institutions and employers to ensure coordination efforts are best utilized and customers receive the services needed to obtain suitable employment.

Moreover, the state will continue to invest in tools and activities that support quality work-based experiences for eligible participants. Coordination and communication across state agencies involved in this work will also remain central to ensuring that quality work-based trainings are available and accessible to those who need it. An example ~~of~~ a successful work-based training model is the MN Pathways to Prosperity (P2P) program which supports participation of enrollees in career pathway programming that increases career awareness, promotes acquisition of basic skills, provides skills-training and education that lead to industry recognized credentials, and works with employers to place participants into positions in high growth, high demand industries that offer long-term employment at family-sustaining wages.

2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

Local Workforce Development Areas (LWDAs) that administer the WIOA Adult and Dislocated Worker programs must ensure that all Registered Apprenticeships are listed on the Eligible Training Provider List (ETPL) through the Career and Education Explorer (CEE) website. This is required for WIOA training funds to be used and for the credential to count toward the Credential Attainment Rate performance indicator. Training providers and their partners are responsible for following this policy to deliver high-quality training opportunities for WIOA participants.

Minnesota Department of Labor and Industry (DLI) and DEED maintain a strategic partnership to expand registered apprenticeship programs as an industry-driven talent pipeline. The collaboration integrates DLI's program registration with DEED's workforce training and career navigation to create pathways for employers and workers.

~~WIOA requires that Local Workforce Development Areas administering the WIOA Adult and WIOA Dislocated Worker program ensure Registered Apprenticeships are posted on the ETPL's Career and Education Explorer (CEE) website in order to use WIOA training dollars and receive credit for that credential within the Credential Attainment Rate indicator. Training providers and their partners must comply with this policy to ensure high-quality training experiences for WIOA program customers.~~

Initial Eligibility

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Registered Apprenticeship posting in Minnesota occurs in four steps:

1. Ensuring the Registered Apprenticeship is listed as Registered and approved by Minnesota's Department of Labor and Industries (DLI).
2. Requiring Registered Apprenticeship providers to accept or deny reporting on Minnesota's Eligible Training Provider (ETP) Annual report.
 - a. If accepted, they agree to supply all information regarding their institution and program details needed for federal reporting purposes.
 - b. If denied, they are not required to provide data elements required for the ETP Annual reporting.
3. Updating information on all posted Registered Apprenticeships within the required deadlines.
4. Maintaining in good standing with all eligibility criteria including ODEO mandated anti-discrimination protocol.

The ETPL application for a Registered Apprenticeship collects the following information prior to listing.

- Name of Eligible Training Provider.
- Description of Training Provider.
- Training Provider Address.
- City, State, and Zip Code.
- Type of Entity.

The ETPL requires these elements be captured in the ETPL portal for all Registered Apprenticeships prior to listing on the CEE:

- Name of Training Program.
- Description of Training Program.
- Registered Apprenticeship – by potential outcome.
- Name of Associated Credential.
- Registered Apprenticeship Field of Study – CIP Code.
- Out-of-Pocket Cost for a Non-WIOA Participant: Tuition, Required Fees, Books and Supplies.
- Registered Apprenticeship Length (Clock/Contact Hours).
- Registered Apprenticeship Length (Weeks).
- Registered Apprenticeship Prerequisites.
- Registered Apprenticeship Format (in-person, distanced learning, or hybrid).
- O*NET-SOC Code Associated with Registered Apprenticeship Occupation.

Registered Apprenticeship must provide this information on every student attending each individual training program:

- Total Number of Individuals Served.
- Total Number of Individuals Completed, Withdrew, or Transferred (Exited).
- All Individuals: Registered Apprenticeship Completed.

~~DEED will provide the following information for reporting purposes on all Registered Apprenticeship who accepted WIOA reporting protocols; students accessing individual Registered Apprenticeships during the reporting period using Unemployment Insurance Wage Detail and Minnesota's case management system, Workforce One (WF1):~~

DEED will report on all Registered Apprenticeships that have agreed to WIOA reporting protocols. This includes students who accessed individual Registered Apprenticeship programs during the reporting period, using data from Unemployment Insurance Wage Detail and Minnesota's case management system, Workforce One (WF1). The following information will be provided:

- Date Registered Apprenticeship was added to the state's ETPL.
- Employment status in the second quarter after exit for all Apprentices.
- Employment status in the fourth quarter after exit for all Apprentices.
- Median Earnings in the second quarter after exit for all Apprentices.
- Credential Attainment for all Apprentices.
- Average Earnings in the second quarter after exit for all Apprentices.
- Average Earnings in the fourth quarter after exit for all Apprentices.
- Total Number of WIOA Participants.
- Total Number of WIOA Participants that Completed, Withdrew, or Transferred (Exiters).
- Total Number of WIOA Participants served with an Individual Training Account (ITA).
- Registered Apprenticeship Completed.
- ITA Funds Received by Program (Cost Per WIOA Participant Served).
- Employment status in the second quarter after exit for WIOA Apprentices.
- Employment status in the fourth quarter after exit for WIOA Apprentices.
- Median Earnings in the second quarter after exit for WIOA Apprentices.
- Credential Attainment for WIOA Apprentices.
- Age of WIOA Apprentices.
- Gender of WIOA Apprentices.
- Race of WIOA Apprentices.
- Ethnicity of WIOA Apprentices.

- Displaced Homemakers status for WIOA Apprentices.
- Low-Income status for WIOA Apprentices.
- Disability status for WIOA Apprentices.
- Ex-offender status for WIOA Apprentices.
- Homeless Individuals or runaway youth status for WIOA Apprentices.
- Youth who are in or have aged out of the foster care system status for WIOA Apprentices.
- English Language Learners, Low Levels of Literacy, Cultural Barriers status for WIOA Apprentices.
- Migrant and Seasonal Farmworkers status for WIOA Apprentices.
- Exhausting TANF within 2 years (Part A Title IV of Social Security Act) status for WIOA Apprentices.
- Single Parents (Including single pregnant women) status for WIOA Apprentices.
- Long-term Unemployed (27 or more consecutive weeks) status for WIOA Apprentices.

When a Registered Apprenticeship is certified, it gains initial eligibility, which lasts for one year. After that year, if providers would like the training to remain certified, training providers must work with DEED/DLI to ensure continued eligibility. DEED and DLI, as appropriate, will work with the providers of provisionally and permanently Registered Apprenticeship to acquire certain data, such as the wages of those who complete training and acquire employment.

After the year of initial eligibility is completed, Registered Apprenticeships who accepted WIOA reporting requirements provide the required information will be considered for continued eligibility. Those Registered Apprenticeship will need to provide any required information for continued eligibility for these participants (including tuition and fees), and information on the Registered Apprenticeship completion rate of participants. DEED will generally acquire as much information (e.g., entered employment rate, wages) through existing data collection processes, without necessitating any paperwork from the training provider. DEED will leverage our inter- agency Minnesota State Longitudinal Data System (SLEDs) to meet the Workforce WIOA reporting requirements for the ETPL.

Only a training institution that has a physical location in Minnesota may apply for listing on Minnesota's ETPL - except for Registered Apprenticeship sponsors, who may apply even if located outside Minnesota. And only a training institution approved for listing on Minnesota's ETPL may request WIOA certification of its programs or sources. WIOA specifically requires training providers to apply for program or course certification.

Any Registered Apprenticeship sponsor in Minnesota whose program is registered with the Minnesota Department of Labor and Industry (DLI) can apply to DEED to be listed on Minnesota's ETPL. Minnesota's ETPL Administrator is committed to working collaboratively with DLI to ensure information is provided to all Registered Apprenticeships to opt-in to be listed publicly. Additionally, any out-of-state Registered Apprenticeship sponsor whose program is registered with the US Department of Labor can apply to DEED to be listed on Minnesota's ETPL.

Minnesota's ETPL is embedded in a comprehensive Career and Education Explorer (CEE) tool, developed by Minnesota's Labor Market Information Office, program administrators, state m

Eligible Training Provider List (ETPL) System Modernization

DEED administers Minnesota's Eligible Training Provider List (ETPL) as the official roster of programs approved for federal workforce funding. To strengthen oversight, transparency, and alignment with industry demand, DEED is executing a funded modernization initiative with the following directives:

- Data Integrity & Management: Modernize ETPL data management by cleaning existing data, automating processes, and implementing tools for bulk uploads and version tracking to ensure accuracy and reduce administrative burden.
- System & Outcomes Integration: Integrate the ETPL with key data streams—including workforce program participation (WF1), wage records, and labor market information—to directly connect training programs to employment outcomes and support performance-based eligibility decisions.
- User Experience & Transparency: Integrate the ETPL with CareerForce.mn.gov and develop comparative dashboards to provide job seekers and case managers with transparent, actionable information on program performance and outcomes.

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Minnesota has a dedicated ETPL Administrator to oversee the state's ETPL and WIOA certification process and a Product Owner to oversee IT related work. The State's policy on WIOA Certification for Training Programs provides definitions, detailed procedures, general and performance reporting requirements, and is available online.

~~The CEE redesign will continue to require Registered Apprenticeships to enter all required information about their institutions and listed programs to ensure ETP reporting to the U.S. DOL is smooth.~~

The State's "Eligible Training Provider List and WIOA Certification for Training Programs" policy provides definitions, detailed procedures, general rules, and performance reporting requirements. This policy is available online.

~~The state is working to update our ETPL policy to incorporate TEGL 8-19 Change 1 as well as make other necessary updates to ensure information is accessible to all. The anticipated completion date for these policy updates is September 30, 2024.~~

See: <https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=565>

- Incorporate additional requirements listed in TEGL 8-19 Change 1.
- Information on training institutions' partnerships with a business.
- Information addressing the alignment of training with in-demand industry sectors and occupations.
- WIOA performance indicators.
- Information reported to state agencies on federal and state training programs other than WIOA Title I-B programs.
- Access to training services throughout each region of the state and by use of technology.
- ETP's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.

- How Registered Apprenticeship are notified on their eligibility to opt-in.
- Clearly defining what the state considers to be a “substantial violation of the requirement to timely and accurately submit data.
- Clearly defined Performance standards and the process for goal setting.

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).

WIOA requires that Local Workforce Development Areas administering the WIOA Adult and WIOA Dislocated Worker program ensure a training program or course whose completion results in a recognized credential is posted as "WIOA-certified," on the ETPL's Career and Education Explorer (CEE) website in order to use WIOA training dollars and receive credit for that credential within the Credential Attainment Rate indicator. Training providers and their partners must comply with this policy to ensure high-quality training experiences for WIOA program customers.

Initial Eligibility WIOA certification in Minnesota occurs in four steps:

1. Ensuring that the training institution has a physical location in Minnesota and are licensed, registered, or otherwise exempt by Minnesota's Office of Higher Education (OHE), or, depending on program, other appropriate state agency.
2. Requiring training institutions provide all information regarding their institution and program details needed for federal reporting purposes. In addition to these elements, they must request each listed program be fully vetted to determine if the ending award is occupationally specific, industry recognized, and student achievements are available to report to DEED and OHE.
3. Updating information on all programs on the state's eligible training provider list within the required deadlines.
4. Submitting ongoing performance data (enrollments, completions, achievements) and maintain in good standing with all eligibility criteria including ODEO mandated anti-discrimination protocol.

The ETPL application for a program, course or Registered Apprenticeship collects the following information prior to listing.

- Name of Eligible Training Provider
- Description of Training Provider
- Training Provider Address
- City, State, and Zip Code
- Type of Entity

The ETPL requires these elements be captured in the ETPL portal for a program, course, or Registered Apprenticeship prior to listing on the CEE:

- Name of Training Program
- Description of Training Program

- Program of study – by potential outcome
- Name of Associated Credential
- Program of Study – CIP Code
- Out-of-Pocket Cost for a Non-WIOA Participant: Tuition, Required Fees, Books and Supplies
- Program Length (Clock/Contact Hours)
- Program Length (Weeks)
- Program Prerequisites
- Program Format (in-person, distanced learning, or hybrid)
- O*NET-SOC Code Associated with Program Occupation

Training institutions must provide this information on every student attending each individual training program:

- Total Number of Individuals Served
- Total Number of Individuals Completed, Withdrew, or Transferred (Exited)
- All Individuals: Program of Study Completed

DEED will provide the following information for reporting purposes on all students accessing individual training program during the reporting period using Unemployment Insurance Wage Detail and Minnesota's case management system, Workforce One (WF1):

- Date program was added to the state's ETPL.
- Employment status in the second quarter after exit for all students
- Employment status in the fourth quarter after exit for all students
- Median Earnings in the second quarter after exit for all students
- Credential Attainment for all students
- Average Earnings in the second quarter after exit for all students
- Average Earnings in the fourth quarter after exit for all students
- Total Number of WIOA Participants
- Total Number of WIOA Participants that Completed, Withdrew, or Transferred (Exiters)
- Total Number of WIOA Participants served with an Individual Training Account (ITA)
- Program of Study Completed
- ITA Funds Received by Program (Cost Per WIOA Participant Served)
- Employment status in the second quarter after exit for WIOA students
- Employment status in the fourth quarter after exit for WIOA students
- Median Earnings in the second quarter after exit for WIOA students

- Credential Attainment for WIOA students
- Age of WIOA students
- Gender of WIOA students
- Race of WIOA students
- Ethnicity of WIOA students
- Displaced Homemakers status for WIOA students
- Low-Income status for WIOA students
- Disability status for WIOA students
- Ex-offender status for WIOA students
- Homeless Individuals or runaway youth status for WIOA students
- Youth who are in or have aged out of the foster care system status for WIOA students.
- English Language Learners, Low Levels of Literacy, Cultural Barriers status for WIOA students
- Migrant and Seasonal Farmworkers status for WIOA students
- Exhausting TANF within 2 years (Part A Title IV of Social Security Act) status for WIOA students
- Single Parents (Including single pregnant women) status for WIOA students.
- Long-term Unemployed (27 or more consecutive weeks) status for WIOA students

In order to be eligible for WIOA-certification, a training program or course must be delivered by an eligible training provider as defined above. The provider must provide an industry- recognized credential upon successful completion of that program or course. The receipt of the credential must depend on the successful completion of the certified program. Being an eligible provider is a necessary, but not sufficient, condition for offering WIOA-certified training.

When a program is certified, it gains initial eligibility, which lasts for one year. After that year, if providers would like the training to remain certified, training providers must work with DEED to ensure continued eligibility. DEED and OHE, as appropriate, will work with the providers of provisionally and permanently certified training programs and courses to acquire certain data, such as the wages of those who complete training and acquire employment.

After the year of initial eligibility is completed, training providers who provide the required information may be considered for continued eligibility. Providers will need to provide any required information for continued eligibility for these programs for participants (including tuition and fees), and information on the program completion rate of participants. DEED will generally acquire as much information (e.g., entered employment rate, wages) through existing data collection processes, without necessitating any paperwork from the training provider. DEED will leverage our inter- agency Minnesota State Longitudinal Data System (SLEDS) to meet the Workforce WIOA reporting requirements for the ETPL.

Only a training institution that has a physical location in Minnesota may apply for listing on Minnesota's ETPL - except for Registered Apprenticeship sponsors, who may apply even if located outside Minnesota. And only a training institution approved for listing on Minnesota's ETPL may

request WIOA certification of its programs or sources. WIOA specifically requires training providers to apply for program or course certification.

Any Registered Apprenticeship sponsor in Minnesota whose program is registered with the Minnesota Department of Labor and Industry (DLI) can apply to DEED to be listed on Minnesota's ETPL. Minnesota's ETPL Administrator is committed to working collaboratively with DLI to ensure information is provided to all Registered Apprenticeships to opt-in to be listed publicly. Additionally, any out-of-state Registered Apprenticeship sponsor whose program is registered with the US Department of Labor can apply to DEED to be listed on Minnesota's ETPL.

~~Minnesota's ETPL is embedded in a comprehensive Career and Education Explorer (CEE) tool developed by Minnesota's Labor Market Information Office, program administrators, state monitors, our Performance and Technical Management team, and MNIT. In 2023, MN began the CEE redesign, with an anticipated launch date of~~

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Minnesota has a dedicated ETPL Administrator to oversee the state's ETPL and WIOA certification process and a Product Owner to oversee IT related work. The State's policy on WIOA Certification for Training Programs provides definitions, detailed procedures, general and performance reporting requirements, and is available online.

To be listed on the state's ETPL, a training institution must be licensed, registered, or otherwise legally exempt through the Minnesota Office of Higher Education. There are a few programs that are authorized by other state agencies (for example, nursing assistant training programs are authorized by the Minnesota Department of Health, not OHE).

If a training provider is not sure of their status, the ETPL Administrator will connect them with the OHE representative to obtain full information about what, if anything, is required of them for full legal authorization.

~~The CEE redesign will continue to require training providers enter all required information about their institutions and listed programs to ensure ETP reporting to the U.S. DOL is smooth.~~

The State's "Eligible Training Provider List and WIOA Certification for Training Programs" policy provides definitions, detailed procedures, general rules, and performance reporting requirements. This policy is available online.

The state ~~continues to is working~~ to update ~~its~~our ETPL policy to ~~incorporate TEGL 8-19 Change 1 as well as make other necessary updates~~ to ensure information is accessible to all. ~~The anticipated completion date for these policy updates is September 30, 2024.~~

See: <https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=565>

- ~~• Incorporate additional requirements listed in TEGL 8-19 Change 1~~
- ~~• Information on training institutions' partnerships with a business.~~
- ~~• Information addressing the alignment of training with in-demand industry sectors and occupations.~~
- ~~• WIOA performance indicators~~
- ~~• Information reported to state agencies on federal and state training programs other than WIOA Title I-B programs.~~

- ~~Access to training services throughout each region of the state and by use of technology.~~
- ~~ETP's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.~~
- ~~How Registered Apprenticeship are notified on their eligibility to opt-in.~~
- ~~Clearly defining what the state considers to be a "substantial" violation of the requirement to timely and accurately submit data.~~
- ~~Clearly defined Performance standards and the process for goal setting.~~

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR FOR THE ADULT PRIORITY OF SERVICE REQUIREMENT IN WIOA SECTION 134 (C)(3)(E) THAT REQUIRES AMERICAN JOB CENTER STAFF, WHEN USING WIOA ADULT PROGRAM FUNDS TO PROVIDE INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES, TO GIVE PRIORITY OF SERVICE TO RECIPIENTS OF PUBLIC ASSISTANCE, LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT (INCLUDING ENGLISH LANGUAGE LEARNERS).

The State has a policy and procedure that provides guidance to local areas on serving public assistance recipients and other low-income individuals. This policy establishes a broad guideline for local judgment of those participants who are "most in need" and require a service plan and outreach process to serve this population. Local providers must establish a system of prioritizing the enrollment of participants and delivery of services in times of limited availability of State and/or Federal resources.

Local providers must write and implement a policy outlining a priority of service policy and include the criteria impacting this policy in annual planning documents ~~requi176red~~ required by DEED. The criteria should apply to all dislocated workers and adults served and ensure availability of program services throughout the program year for those who meet the local priority of service.

Local providers should determine priority on an individual basis. Staff members with the local provider may determine an individual's "most in need" status based on his/her unique factors and barriers. Local providers should intervene early with eligible customers. DEED monitors these activities through our client data system to ensure this priority is addressed. The outcomes of these efforts become a part of monitoring reports.

The State (DEED) implements an annual monitoring schedule on all Federal grants to ensure that local areas are following and implementing the required Federal and/or State policies relevant to the grants being executed. A part of the monitoring process is ensuring that local areas are enrolling participants based on priority of service. Local areas are also required to provide the State a copy of their priority of service policy. If they do not have one in place, they have the option to follow the DEED's Priority of Service Policy and inform the State of such decision.

During monitoring, monitors ensure that priority is given based upon the priority of service outlined in DEED's WIOA Adult Eligibility and Priority of Service Policy (<https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=508>), with first priority going to Veterans and eligible spouses who are low income or recipients of public assistance or who are basic skills deficient.

Additionally, DEED will also be updating the case management system to allow staff to pull and monitor this data efficiently. Furthermore, DEED will continue to ensure that local areas have

updated strategic plans, policies and procedures implementing priority of service to ensure that at least 75% of the participants in the Adult program are from at least one of the priority groups, ~~as outlined in TEGL 7-20.~~

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

The State's criteria is as follows -

- This policy provides the mechanism for transferring up to 100 percent of formula-allocated WIOA Title I-B Adult funds to WIOA Title I-B formula-allocated Dislocated Worker funds and vice versa.
- Background: In accordance with WIOA Law, local workforce investment boards shall ensure the formula-based WIOA Dislocated Worker program, like all partners, contributes proportionally to one-stop core services' costs. ~~Some providers have expressed a wish to use implement~~ WIOA Law, Section 133(b)(4), to transfer funds between Dislocated Worker and Title I-B Adult to accomplish this.
- Procedures: In accordance with WIOA Law, Section 133(b)(4), a local workforce council can, with state approval, transfer up to 100 percent of a program year allocation for Adult employment and training activities, and up to 100 percent of a program year allocation for Dislocated Worker employment and training activities, between the two programs. A local service provider cannot transfer funds to or from a WIOA Title I-B Youth Program.

In order for DEED to approve the request, the local provider will need to provide a rationale for the transfer in accordance with the request form given below.

A requesting provider must submit the following three documents:

- 1) a completed and signed Request to Transfer Funds: Adult/Dislocated Worker form;
- 2) a revised Dislocated Worker program budget and participant information forms (found in the Planning Guidelines); and
- 3) a revised Adult program budget and participant information forms (found in the Planning Guidelines)

6. DESCRIBE THE STATE'S POLICY ON WIOA AND TAA CO-ENROLLMENT AND WHETHER AND HOW OFTEN THIS POLICY IS DISSEMINATED TO THE LOCAL WORKFORCE DEVELOPMENT BOARDS AND REQUIRED ONE-STOP PARTNERS. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.325, 20 CFR 618.824(A)(3)(I).

DEED requires that TAA participants be co-enrolled in the Dislocated (DW) program. This requirement ensures participants have access to basic and individualized career services as well as other resources available at CareerForce Locations across the state. This policy was last updated on 9/28/2022 pursuant to 20CFR 618.325.

7. DESCRIBE THE STATE'S FORMAL STRATEGY TO ENSURE THAT WIOA AND TAA CO-ENROLLED PARTICIPANTS RECEIVE NECESSARY FUNDED BENEFITS AND SERVICES. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.816(C)

All DW providers awarded WIOA DW allocations must use WIOA funds to support at least one individualized career service for all DW participants prior to or at the time of TAA plan approval.

If the DW provider, ~~in which the case managing DW counselor is employed,~~ does not receive WIOA DW funds from DEED, co-enrollment in the state funded DW program is required.

All services received by DW participants as well as information on what funding sources have supported those services are captured within each record's activity details. All DW case records are reported through Minnesota's case management tracking system, Workforce One.

8. DESCRIBE THE STATE'S PROCESS FOR FAMILIARIZING ONE-STOP STAFF WITH THE TAA PROGRAM. 20 CFR 618.804(J), 20 CFR 618.305

~~Although the TAA program is not currently accepting new applicants, ongoing technical assistance is provided to ensure one-stop operators remain familiar with the program. Trade Adjustment Assistance (TAA) holds regular technical assistance, virtually and in person, for one-stop staff to support familiarity with the TAA program.~~ Additionally, TAA provides updates at monthly meetings for WDA partners and other relevant stakeholders.

C. YOUTH PROGRAM REQUIREMENTS.

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

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.¹¹ FURTHER, INCLUDE A DESCRIPTION OF HOW THE STATE ASSISTS LOCAL AREAS IN DETERMINING WHETHER TO CONTRACT FOR SERVICES OR TO PROVIDE SOME OR ALL OF THE PROGRAM ELEMENTS DIRECTLY.

¹¹ Sec. 102(b)(2)(D)(i)(V)

Request for Proposals (RFPs) issued by Local Workforce Development Boards (LWDBs) reflect the need to provide a connection to the WIOA indicators of youth program performance. See Minnesota's Procurement of Youth Services Policy (Chapter 16) under WIOA: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>

The following criteria have been established by the state to be used by local boards in awarding grants or contracts for youth workforce development activities. These criteria support the ability of youth providers to meet primary indicators of performance, while prioritizing supports and services to youth from under-served communities.

1. Programs provide Adult Support, Structure and Expectations to help young adults meet their employment and education goals (State WIOA youth policy Chapter 11 can be found at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>). Examples include:
 - Adult Support, Structure and Expectations (State WIOA youth policy Chapter 11 can be found at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>)

- Strengthen and practice cultural competency while supporting Youth Voice and building youths' ability to advocate for services and opportunities.
- Committed/skilled adults mentor youth and communicate high expectations for what youth can do and achieve.
- Youth and families assisted to access and learning how to use technology.
- Connections and referrals to mental health resources.

Connection to primary indicators of performance: These services support attainment of industry recognized credentials leading to placement and retention in high-growth jobs important to regional economies. With adult support/mentoring, youth are better able to overcome barriers, attain credentials, enter employment and reach education goals.

Connection to the Guideposts for Success: These services correlate with Guidepost three and five: Youth Development and Leadership and Family Involvement. Youth who participate in activities related to the Guidepost competencies are better prepared to successfully transition to adulthood. Minnesota's youth program also leverages the Guideposts for Success when implementing the person-centered Integrated Resource Team (IRT) model when providing services to youth.

2. Programs provide Introduction to Career Pathways (State WIOA youth policy Chapter 9 and Chapter 13 can be found at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>) through proactive outreach to meet the needs of youth under-represented in Minnesota's workforce; youth have access to good jobs promoting economic stability. Examples include:

- Career pathways aligned with industry-recognized credentials. Youth prepared to meet secondary and postsecondary education goals, including pre-apprenticeship opportunities.
- Career assessment and exploration strategies.
- Emphasis on job quality through work experience, work-based learning and service-learning experiences.
- Career and technical education and other career related applied learning. Training that builds skills and knowledge needed to effectively use technology.
- Career guidance includes information about benefits.

Connection to primary indicators of performance: These services promote youth employment in high growth jobs with wage increase potential. Youth learn necessary skills and develop expertise in specific occupational/industrial areas. A career pathways model leads to program retention as youth participants clearly see the relevance of what they are doing to overall labor market demands.

Connection to the Guideposts for Success: The services outlined under this policy are reinforced by Guidepost two: Career Preparation and Work-based Learning. Experiences related to Guidepost two supports youth in obtaining core educational competencies needed to succeed in the adult workforce and earn a family sustaining wage.

3. Programs provide a Combination of Guidance and Connections to the Workplace (State WIOA youth policy Chapter 11 can be found at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>).

Examples include:

- Use of readily accessible and understood Labor Market Information (LMI) to assess employment opportunities in high-growth industries and in-demand occupations.
- Activities demonstrate strong employer engagement, involvement of the business community.
- Activities that build career exploration skills that enable youth to identify how various career options match their interests, skills, and work experience.
- Activities support development of career-specific work skills and knowledge; and employability or soft skills such as communication, leadership, decision-making, and conflict management.
- Support services address youths' personal and family needs and reduce barriers to work.

Connection to primary indicators of performance: These services facilitate the development of a path for youth to become economically and socially self-sufficient, recognizing that there are different ways to meet the evolving needs of youth participants. Youth acquire work experience, credentials and develop skills to meet the demands of the local labor market.

Connection to the Guideposts for Success: Activities and services provided under this policy relate to Guideposts one: School-based Preparatory Experiences. These experiences provide youth with a solid educational foundation and exposure to in-demand and high-growth career fields. The Guideposts for Success also provides service providers with best practices as it relates to holding high expectations for all youth, but especially youth with disabilities. This, in turn, supports youth with disabilities succeed in career pathways programming.

4. Programs provide Support and Follow-Up (State WIOA youth policy Chapter 11 can be found at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>) Examples include:

- Services appropriate to youth needs, such as: English language instruction, childcare, financial literacy, transportation, housing, mental health, or health care.
- Activities with strong built-in follow-up mechanisms to support strong participant outcomes.
- Effective case management skills that provide comprehensive guidance, counseling, and referrals to coordinate a progression of services and activities, elevating Youth Voice and addressing mental health.
- Activities that engage parents, families, and other caring adults who are involved in the young person's life and can support their ability to achieve independence, self-advocacy, and self-sufficiency (Integrated Resource Team model).

Connection to primary indicators of performance: These services lead to employment retention as youth understand that they have support following program exit. Problems on the job can be resolved working through the follow-up components, the employer, and the youth. These

services will also lead to increased employer satisfaction with the youth programs leading to increased participation by the private sector.

Connection to Guideposts for Success: Services tied to this policy are supported by Guidepost four and five: Connecting Activities and Family Involvement. Youth and families that are aware of available support services and community opportunities help youth transition more successfully to adulthood. Support and follow up services are inclusive of under-served communities and support youth in persisting through educational and career pathways programming.

5. Programs leverage Youth as a Resource and elevate Youth Voice (State WIOA youth policy Chapter 10 and Chapter 11 can be found here: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>). Examples include:

- Peer to peer leadership activities that build critical thinking skills, conflict resolution skills and recognize young people as an important resource in improving their own lives.
- Self-advocacy skills that allow youth to make choices about and take an active role in setting education and career goals.
- Self-determination skills that enable youth to identify interests, skills and values.

Connection to primary indicators of performance: With the acquisition of self-advocacy skills by participants, youth will be more valuable assets to employers leading to greater program satisfaction by both employers and participants.

Connecting to the Guideposts for Success: The activities and services provided related to this policy are also described by Guidepost three: Youth Development and Leadership. Youth who have developed the skills to be advocate for their own needs as well as participate in leadership experiences are better prepared to contribute positively to their communities. Leadership activities are also an area of focus when service providers are leveraging the Integrated Resource Team model of service delivery.

6. Programs demonstrate Implementation Quality and Job Quality: (State WIOA youth policy Chapter 10 can be found at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>). Examples include:

- Well thought-out implementation strategies followed and tracked through a continuous improvement process.
- Flexible services that address regional needs and proven methodologies.
- High quality work experiences aligned with training opportunities connecting employer partners who are positioned to recruit and train program graduates.
- Services that incorporate evaluation components feature include youth voice and feedback as well as employer input and satisfaction.
- Equality of opportunity for everyone, including nondiscrimination, individualization, inclusion, diversity, accessibility, and integration.
- Equitable access to support services, including, transportation, referrals to physical and mental health assistance, housing assistance, childcare and income supports such as UI, TANF and SNAP.

Connection to primary indicators of performance: These criteria support the WIOA Youth performance accountability measures. Minnesota WDAs serve high numbers of at-risk youth from under-represented communities, including homeless youth, foster youth, youth with disabilities and youth on public assistance. These target groups are taken into consideration as WDAs work with DEED's Youth Services Team to negotiate the following local WIOA Youth performance goals.

Connection to Guideposts for Success: Programmatic quality can be enhanced by connecting the Guideposts for Success to the 14 required program elements. Service providers can leverage new and existing partnerships including family members to support youth as they make the transition from youth settings to adult settings. The core competencies described in the Guideposts for Success have been identified as valuable for achieving goals related to economic success and participation in community life during adulthood, especially for youth with disabilities.

All policies supporting Minnesota's WIOA Youth program can be found at:

<https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>.

2. EXPLAIN HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN ACHIEVING EQUITABLE RESULTS FOR OUT-OF-SCHOOL AND IN-SCHOOL YOUTH. DESCRIBE PROMISING PRACTICES OR PARTNERSHIP MODELS THAT LOCAL AREAS ARE IMPLEMENTING AND THE STATE'S ROLE IN SUPPORTING AND SCALING THOSE MODELS WITHIN THE STATE FOR BOTH IN-SCHOOL AND OUT-OF-SCHOOL YOUTH.

Chapter 20 of the WIOA Youth Administrative Policies (see <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>) provides examples of how WIOA Youth funds support outreach and recruitment activities. Local Workforce Development Boards (LWDB) do proactive outreach to under-served communities. Outreach activities and materials are provided in multiple languages to assure that under-served youth have equal access to accessible services under WIOA Youth.

[Recruitment of out-of-school youth includes outreach to eligible youth ages 16-24 interested in pursuing work experience, work-based learning, occupational skill training and access to postsecondary education and credentials. LWDBs use multiple strategies to recruit Out-of-School Youth, including: In-Person Outreach, Printed brochures and Flyers, Radio and TV, Websites, E-Mail Communications, Text Message Applications, Social Media, and referrals from community based organizations.](#)

[Service to out-of-school youth requires a program mix that is flexible and accessible to address a spectrum of individual needs and skill levels and has the means \(through assessment\) to identify those needs. Interagency partnerships are established between the WDA/LWDB, local technical colleges, universities, adult basic education \(ABE\), Human Services, Health, Corrections and other workforce development and education partners. The WDA's on-site presence at technical colleges and ABE Centers and Area Learning Centers promotes communication with Financial Aid Officers who identify out-of-school youth who qualify for and could benefit from WIOA Youth services.](#)

[Out-of-school youth in need of work experience, occupational skills training and access to postsecondary training and credentials are recruited from: Adult Basic Education \(ABE\), Vocational Rehabilitation Services \(VRS\), the Minnesota Family Investment Program \(MFIP\), and the Supplemental Nutrition Assistance Program \(SNAP\). Key staff in local school districts provide](#)

information on WIOA for students who drop out of school. Area Learning Centers (ALCs) include WIOA Youth applications in senior student portfolios.

– WIOA Youth service providers receive referrals of out-of-school youth from: local community based organizations, Veterans Services staff, Community Action Agencies, correctional agencies, and local libraries.

All Local Workforce Development Boards develop a Shared Vision for Youth Blueprint each year as part of their Local Youth Plans. The Blueprints depict local strategies and partners engaged in improving outcomes for youth who are most in need of services under WIOA. To view the Blueprints and the Local Youth Plans, please visit DEED’s webpage: <https://mn.gov/deed/programs-services/office-youth-development/special/shared-vision/>.

– The Shared Vision for Youth Blueprints identify interagency projects underway at the WDA level to improve transition outcomes for:

- Homeless youth and runaways;
- Dropouts and potential dropouts;
- Youth with disabilities; and
- Youth in foster care.
- Juvenile Offenders

Minnesota’s youth workforce system continues to prioritize foster youth, one of the state’s highest-needed populations, by providing targeted, comprehensive services that support their transition to stability, education, and employment. Across all youth programs, 663 foster youth received case-managed services, representing 4 percent of all youth served statewide. WIOA Youth supported 187 foster youth (8%), the Minnesota Youth Program served 217 (5%), and Youth at Work Opportunity Grants served 180 (2%). Additional services were provided through YouthBuild (43 youth, 7%), TANF Youth (5 youth, 3%), and Youth Support Services (32 youth, 3%). The emphasis placed on serving foster-involved youth aligns with the recent Executive Order, Fostering the Future for American Children and Families. More specifically, Minnesota’s federal and state youth employment programs can help carry out the intent of the Executive Order focused on employment opportunities for youth aging out of the foster system.

The Guideposts for Success, a best practices framework developed by the National Collaborative on Workforce and Disability for Youth (NCWD) and revised by the Center for Advancing Policy on Employment for Youth (CAPE- Youth), supports the overarching WIOA youth goals and outcomes in serving out-of-school youth, especially youth with disabilities.

Integrated Resource Teams (IRTs) develop action plans to serve and support out-of-school youth. IRT partners may include (but are not limited to): representatives from county social services foster care units, juvenile corrections, homeless youth service providers and drop-in centers, ABE service providers, mental health professionals, chemical dependency counselors, youth, parents, and community-based organizations. The IRT members use a youth-driven approach when developing a plan to help the youth achieve their education and employment goals.

– LWDB’s co-enroll WIOA youth participants in other federally funded programs, such as MFIP, VRS, Youthbuild, and ABE, for example. Out-of-school youth may also be co-enrolled in the WIOA Adult program. Leveraging these additional resources increases the potential for shared positive outcomes in youth and adult programs at the state and local level.

[In April 2024, Minnesota received a 5-year, \\$17 million Employment Transition Model Grant from the Office of Disability Employment Policy at the USDOL. The grant is focused on Youth with Disabilities ages 14-24 living in rural Minnesota. There are five LWDBs participating in the project as well as the Minnesota's designated Parent Training and Information Center \(PTI\), the PACER Center. The LWDBs plan to provide services to over 800 youth with disabilities throughout the life of the grant. The PACER Center's role will be to provide localized technical assistance and professional development activities for LWDB staff as well as providing parent and family trainings through each of the LWDB service areas. The Guideposts for Success, the 14 WIOA program elements, and the use of Integrated Resources Teams \(IRTs\) will be leveraged to ensure youth-driven services are provided to ensure a no-wrong-door approach to services delivery model is implemented. Minnesota will also expand the number of Employment Networks that are available to broaden access to disability related employment supports and services across rural Minnesota. The employment networks will not only bolster the youth workforce development system, but also support increased access to services for adults who have a Ticket to Work. Local staff will be completing the Certified Work Incentive Practitioner \(C-WIP\) course to better support individuals receiving public assistance benefits. Additionally, Minnesota's Department of Human Services has developed a Minnesota specific certification called the Benefits Coach Certification. This three-tiered certification opportunity will provide career counselors and LWDB administrative staff with the knowledge and skills to better serve Minnesotan's receiving Minnesota specific public benefits. By having LWDB staff with the skills to work with public beneficiaries, the project will be able to work with individuals to relinquish the need for public benefits by obtaining family sustaining competitive integrated employment.](#)

[Innovative approaches to service delivery will be a critical component of the ETM grant. Opportunities to provide youth with virtual reality career exploration activities, access to artificial intelligence training and career development, as well as virtual learning opportunities will be made available to youth. These activities will be important for youth to ensure they have a skill set that is ready for the adult labor force. To ensure success in the adult labor force, the LWDBs will leverage existing employer partners as well as working with local business service representatives to identify new employers that are willing to host youth for short-term, paid work-based learning experiences. Employers who find success with the youth, will ideally hire youth into full-time, competitive integrated employment opportunities. Additional opportunities like pre-apprenticeship/apprenticeship opportunities will be made available to youth who are interested in those pathways.](#)

[Many of the youth that will receive services under the ETM grant will be co-enrolled in WIOA Youth and/or the Minnesota Youth Program. Based on the individual need of each youth, co-enrollments with Vocational Rehabilitation Services and VR-Blind will occur when necessary. Interagency State-level partnerships with Minnesota State Colleges and Universities, Department of Labor and Industry, and Office of Higher Education will be expanded upon to ensure alignment with workforce and education activities. The Guideposts for Success will be used as a model when convening IRTs to ensure additional service providers, teachers, worksite supervisors, parents, and others are included to support youth through programming. Through this project, new resources, strategies, and best practices will be disseminated throughout the broader workforce development system in Minnesota to not only ensure continuity, but to improve the system state-wide.](#)

[Minnesota's Youth at Work program also serves as a unique funding mechanism for LWDBs across the state. The Youth at Work funds provide the LWDBs with the opportunity to competitively apply for youth workforce development funds that allow for a breadth of programming opportunities.](#)

Many of the LWDBs that are awarded funds leverage Youth at Work funds to provide innovative programming that recently has included the use of virtual reality goggles and artificial intelligence.

Recruitment of out-of-school youth includes outreach to eligible youth ages 16-24 interested in pursuing work experience, work-based learning, occupational skill training and access to postsecondary education and credentials. LWDBs use multiple strategies to recruit Out-of-School Youth, including: In-Person Outreach, Printed brochures and Flyers, Radio and TV, Websites, E-Mail Communications, Text Message Applications, Social Media, and referrals from community-based organizations.

Service to out-of-school youth requires a program mix that is flexible and accessible to address a spectrum of individual needs and skill levels and has the means (through assessment) to identify those needs. Interagency partnerships are established between the WDA/LWDB, local technical colleges, universities, adult basic education (ABE), Human Services, Health, Corrections and other workforce development and education partners. The WDA's on-site presence at technical colleges and ABE Centers and Area Learning Centers promotes communication with Financial Aid Officers who identify out-of-school youth who qualify for and could benefit from WIOA Youth services.

Out-of-school youth in need of work experience, occupational skills training and access to postsecondary training and credentials are recruited from: Adult Basic Education (ABE), Vocational Rehabilitation Services (VRS), the Minnesota Family Investment Program (MFIP), and the Supplemental Nutrition Assistance Program (SNAP). Key staff in local school districts provide information on WIOA for students who drop out of school. Area Learning Centers (ALCs) include WIOA Youth applications in senior student portfolios.

Integrated Resource Teams (IRTs) develop action plans to serve and support out-of-school youth. IRT partners may include (but are not limited to): representatives from county social services foster care units, juvenile corrections, homeless youth service providers and drop-in centers, ABE service providers, mental health professionals, chemical dependency counselors, youth, parents, and community-based organizations. The IRT members use a youth-driven approach when developing a plan to help the youth achieve their education and employment goals.

WIOA Youth service providers receive referrals of out-of-school youth from: United Way, Lutheran Social Services, Catholic Charities, Salvation Army, Veterans Services staff, Community Action Agencies, correctional agencies and local libraries.

All Local Workforce Development Boards develop a Shared Vision for Youth Blueprint each year as part of their Local Youth Plans. The Blueprints depict local strategies and partners engaged in improving outcomes for youth who are most in need of services under WIOA. To view the Blueprints and the Local Youth Plans, please visit DEED's webpage: <https://mn.gov/deed/programs-services/office-youth-development/special/shared-vision/>.

The Shared Vision for Youth Blueprints identify interagency projects underway at the WDA level to improve transition outcomes for:

- Homeless youth and runaways;
- Dropouts and potential dropouts;
- Youth with disabilities;
- Youth in foster care; and

• Juvenile Offenders

~~The Guideposts for Success, a best practices framework developed by the National Collaborative on Workforce and Disability for Youth (NCWD) and revised by the Center for Advancing Policy on Employment for Youth (CAPE Youth), supports the overarching WIOA youth goals and outcomes in serving out-of-school youth, especially youth with disabilities.~~

~~LWDB's co-enroll WIOA youth participants in other federally-funded programs, such as MFIP, VRS, Youthbuild, and ABE, for example. Out-of-school youth may also be co-enrolled in the WIOA Adult program. Leveraging these additional resources increases the potential for shared positive outcomes in youth and adult programs at the state and local level.~~

3. DESCRIBE HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN IMPLEMENTING INNOVATIVE MODELS FOR DELIVERING YOUTH WORKFORCE INVESTMENT ACTIVITIES, INCLUDING EFFECTIVE WAYS LOCAL WORKFORCE BOARDS CAN MAKE AVAILABLE THE 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2); AND EXPLAIN HOW LOCAL AREAS CAN ENSURE WORK EXPERIENCE, INCLUDING QUALITY PRE-APPRENTICESHIP AND REGISTERED APPRENTICESHIP, IS PRIORITIZED AS A KEY ELEMENT WITHIN A BROADER CAREER PATHWAYS STRATEGY.

(See: State WIOA youth policy Chapter 11 can be found at: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>)

Each WDA develops a Local Youth Plan which identifies how the following 14 required program elements are made available to WIOA youth participants. Local Youth Plans are posted on DEED's website, see: <https://mn.gov/deed/about/what-we-do/objectives-plans/wioa.jsp#3>. WDAs provide training for Youth Service Providers on how the WDA assures provision of all 14 program elements for each participant.

- Tutoring, study skills training, instruction, and dropout prevention services
- Alternative secondary school services or dropout recovery services
- Paid and unpaid work experience
- Occupational skill training
- Education offered with workforce preparation activities and training
- Leadership development activities
- Supportive services
- Adult Mentoring
- Follow-up Services
- Comprehensive guidance and counseling
- Financial literacy education
- Entrepreneurial skills training
- Labor market and employment information about in-demand industry sectors/occupations
- Postsecondary preparation and transition activities

DEED's review of the Local Youth Plans assures that each WDA describes how the 14 required program elements will be available to WIOA participants. On-site Program Monitoring by DEED confirms that the 14 required program elements and related training are available at the WDA level (as described in the Local Youth Plans). WDAs provide training to youth service providers/youth counselors on the 14 required program elements.

State and federally-funded Youthbuild programs offer a nationally-recognized model for pre-apprenticeship training. Co-enrolling out-of-school youth in WIOA Youth and federally-funded Youthbuild programs is underway at the WDA level. The number of Youthbuild participants entering registered apprenticeship programs has increased through partnering. For more information, see the Youthbuild webpage: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/youthbuild.jsp>.

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.

(See: State WIOA youth policy Chapter 2 and all other policies including Chapter 2 can also be found here: <https://mn.gov/deed/programs-services/office-youth-development/youth-programs/wioa-youth.jsp#2>).

Minnesota's Workforce Development Boards include in their Local Youth Plans their definition of "an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment." This definition must be reasonable, quantifiable, and based on evidence that the specific characteristic of the youth identified objectively requires additional assistance. Examples may include, but are not limited to: Migrant youth, incarcerated parent, behavior problems at school, family literacy problems, domestic violence, substance abuse, chronic health conditions, one or more grade levels below appropriate age, immigrant/refugee.

D. SINGLE-AREA STATE REQUIREMENTS

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

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

E. WAIVER REQUESTS (OPTIONAL)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;
2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;
3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;
4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:
 - 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 MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES OBSERVED THROUGH IMPLEMENTATION OF THE EXISTING WAIVER, IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

WIOA WAIVER REQUEST: ALLOW USE OF INDIVIDUAL TRAINING ACCOUNTS (ITAS) FOR IN-SCHOOL YOUTH

TITLE I YOUTH PROGRAM

PROGRAM YEAR 2026-2027

I. IDENTIFICATION OF THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS BEING REQUESTED:

Minnesota is requesting renewal of a waiver to provide Minnesota WDAs with the flexibility to use Individual Training Accounts (ITAs) for in-school youth under PY26-27 WIOA Youth. The waiver impacts WIOA Regulation 20 CFR 681.550.

According to current WIOA Regulations, ITAs were established to provide individual customer choice in their education and training plans and provide flexibility to service providers. At present, only out-of-school youth (OSY) ages 18-24 can use ITAs. In-school youth (ISY), ages (16-21), deserve the same flexible opportunities for support as out of school youth. Without this waiver, ISY would have to be closed out and enrolled as OSY.

II. GOALS THAT MINNESOTA AND ITS WORKFORCE DEVELOPMENT AREAS (WDAS) INTEND TO ACHIEVE AS A RESULT OF THE WAIVER:

The goal of this is to allow WIOA youth service providers the option to use ITAs for ISY, ages 16-21. Serving in-school and out-of-school youth with the same ITA policy

allows for continuity of services for all WIOA youth. All youth will be eligible to receive training services, connection to work-based learning and job search support. To better connect youth to work-based learning, both in school and out of school youth would be able to use the Eligible Training Provider List (ETPL) to find training programs that support individualized needs. The waiver would permit youth service providers to customize services to ISY, ages 16-21, to match their interests and abilities.

III. RELATIONSHIP OF GOALS TO THE MINNESOTA STATE PLAN:

Minnesota's State Plan describes how resources will be used to assist individuals who need assistance to become economic and socially self-sufficient. The populations (i.e. foster youth, homeless youth, pregnant/parenting youth, youth with disabilities, etc.) targeted in Minnesota's plan are those for whom WIOA Youth Programs are critical.

The strategic vision of the One Minnesota Workforce Development Vision is a healthy economy where all Minnesotans have equitable access to a workforce development system in which partners across the state are working toward a collective goal of providing workforce development programs that are responsive to employer needs in in-demand occupations and lead to good jobs with family-sustaining wages.

Minnesota has identified the following goals in the 2024-2027 State Plan:

1. Increase interagency and local area coordination and alignment around shared goals, maximizing efficiency and coordination of workforce funding and programs and improving system integration, and creating a "no wrong door" approach for individuals or employers engaging in the workforce system.
2. Build employer-led industry-sector partnerships across the state to create or expand responsive and equitable workforce development programs and career pathways with embedded work-based learning or on-the-job training, including Registered Apprenticeships, focused on closing gaps in participation and representation based on race, ethnicity, disability, gender, veteran status, and age.
3. Create a more inclusive, equitable, accessible, and proactive workforce system to serve all Minnesotans, preparing employers and the current and emerging workforce for the changing nature of work including new and emerging technology, changing labor market demands, and for the state's shifting demographics, including our new Minnesotans.

In sum, the data show that current population and aging trends in Minnesota will lead to an extremely tight labor market over the next two decades – with some local areas already experiencing labor force declines. The challenges our state will face over the next 15 years are so great that we'll need to tackle them with a multi-pronged approach to attract and retain workers of all demographic characteristics. Retaining young talent, including homeless and foster youth, and removing barriers and increasing access to WIOA Youth programming is necessary to address these workforce challenges.

Because communities of color in Minnesota continue to grow faster than the white population, particularly in the younger working-age populations, the labor force will continue to diversify rapidly. Recognizing that the rapidly increasing share of existing workers are people of color, Minnesota's state plan recognizes that Minnesota must address this problem of persistent racial disparities directly. By approving this waiver, Minnesota's WIOA Youth service providers can better support this effort by support any BIPOC youth who are homeless or involved in the foster system.

This waiver allows Minnesota to target WIOA Youth resources to a population that is at-risk of homelessness, a group that is experiencing an opportunity gap. Data provided below in this waiver request highlights the success of efforts conducted under the previously approved waiver.

IV. ACTIONS THE STATE HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS:

No State or local statutory or regulatory barriers exist that would prevent the implementation of this waiver.

V. DETAILED GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED:

Goals of the waiver include:

- Supporting customer choice;
- Supporting employer engagement;
- Connecting education and training strategies;
- Supporting work-based learning; and
- Improving job and career results.

As Minnesota's ETPL grows, the choices available to in-school youth will grow as well. This waiver will allow the in-school student to participate in and benefit from the growth of the employment and training network.

We are expecting the following programmatic outcomes:

- 75 percent of in-school youth, ages 16-21, undertaking occupational training will have ITAs; and,

As required by federal policy, all ITAs will use training providers on the ETPL.

VI. ANALYSIS OF MINNESOTA ISY ITA YOUTH WAIVER

(ISYs w/HS Equivalent and w/1+ years of Post-Secondary at Enrollment)
PY 24 Outcomes

WIOA Youth Performance Measure	PY 24 Negotiated MN Goal	All Exiters PY 2024	Percent	PY 2024 ISY w/ITA	Pct. Of PY 24 MN Goal
Youth Employment/ Education/Training Rate 2nd Quarter After Exit (7/1/23 to 6/30/24)	74.50%	69.8%	94.0%	93.3%	125%
Youth Employment/ Education/Training Rate 4th Quarter After Exit (1/1/23 to 12/31/23)	74.90%	71.9%	96.0%	100%	133.5%
Credential Attainment Rate (1/1/2023 to 12/31/23)	62.0%	59.1%	95.3%	81.8%	131.96%
Measurable Skills Gain (7/1/24 to 6/30/25))	53.0%	62.7%	118%	81.8%	131.9%
Median Earnings Second Quarter After Exit (7/1/22 to 6/30/24)	\$5,400	\$ 6,411	119%	N/A	N/A

ISY/ITA Youth Served (7/1/24 to 6/30/25)	54
ISY/ITA Youth Exited (4/1/24 to 3/31/25)	53

WIOA Youth ITAs for PY2024				
WDA	Name	ISYs	OSYs	Total

WDA 1	Northwest Minnesota	0	0	0
WDA 2	Rural Minnesota	0	0	0
WDA 3	Northeast Minnesota	7	30	37
WDA 4	City of Duluth	1	1	2
WDA 5	Central Minnesota	2	7	9
WDA 6	Southwest Minnesota	0	0	0
WDA 7	South Central Minnesota	1	20	21
WDA 8	Southeast Minnesota	0	0	0
WDA 9	Hennepin Carver County	0	0	0
WDA 10	City of Minneapolis	0	0	0
WDA 12	Anoka County	1	3	4
WDA 14	Dakota - Scott County	0	0	0
WDA 15	Ramsey County	0	0	0
WDA 16	Washington County	0	0	0
WDA 17	Stearns-Benton Counties	0	0	0
WDA 18	Winona	0	0	0
Total		12	61	73

Source- Futureworks as of 8-3-25

Based on the data gleaned from our online FutureWorks WIOA data as of June 30, 2025, we have determined that all ISYs who are in Occupational Skills Training and have an ITA are all using a provider that is on the Minnesota Eligible Training Provider List. The who exited from WIOA Youth from July 1, 2024 through June 30, 2025 were also using providers from the ETPL.

VII. ALIGNMENT WITH DEPARTMENT OF LABOR POLICY PRIORITIES

This waiver is in alignment with Department of Labor priorities as follows:

Connecting Education and Training Strategies

This waiver allows WIOA youth service providers to offer in school youth the flexible option to use ITAs to access training programs on the ETPL. The waiver expands the education and training opportunities for in school youth.

Improving Job and Career Results

Allowing both ISY and OSY to use ITAs to find training opportunities that match their interest, support their learning styles and better prepare them for work-based learning and employment.

With the reduced administrative burden on youth service providers, there can be an increased effort on networking and partnering to assure that meet the needs of both eligible in-school and out of school youth and improve shared outcomes.

VIII. INDIVIDUALS AFFECTED BY THE WAIVER

ISY (secondary school attendees) who meet the age requirements (ages 16-21 at the time of enrollment) will be the individuals affected by the waiver, especially youth who are under-represented in the workforce. These youth often have multiple barriers to employment requiring additional resources to become self-sufficient. This waiver provides WIOA youth service providers with more flexibility to serve in-school youth who are most in need of services.

IX. MONITORING/LOCAL COMMENT

Monitoring

DEED's youth program staff will monitor the implementation of the waiver at the WDA level on a quarterly basis using FutureWorks, Workforce One, and Service Provider data. DEED's monitoring team will review the progress of waiver implementation. As required, DEED will report to DOL progress in achieving the waiver as well as any changes needed. Additionally, DEED will report information on the waiver and its outcome in Minnesota's WIOA Annual Report.

Local Comment

DEED will ensure through direct communications and through its website that local comment (local Workforce Development Boards, Youth Committees, local business, and organized labor) is obtained on this waiver. Additionally, DEED staff will meet with local WDA/LWDB staff to obtain comments. DEED will inform the Department of Labor of any comments received.

UPDATED: November 2025

WIOA WAIVER REQUEST: REDUCE OSY EXPENDITURE REQUIREMENT
FROM 75 PERCENT TO 60 PERCENT

TITLE I YOUTH PROGRAM
PROGRAM YEARS 2026-2027

I. IDENTIFICATION OF THE STATUTORY OR REGULATORY REQUIREMENTS FOR
WHICH A WAIVER IS BEING REQUESTED:

The State of Minnesota is requesting renewal of a waiver for Program Years 2024-25 from the Workforce Innovation and Opportunity Act (WIOA) Section 129(a)(4)(A) and the corresponding regulation at 20 CFR 681.410 which requires that at least 75 percent of WIOA youth funds be spent on out-of-school youth. The State of Minnesota is requesting that Minnesota's current waiver be extended to allow Local Workforce Development Areas (LWDAs) to expend 60 percent of WIOA youth funds on out-of-school youth and 40 percent on in-school youth who meet the U.S. Department of Labor's definition of homeless and/or foster youth.

A youth is considered a homeless if the individual:

Lacks a fixed, regular, and adequate nighttime residence; this includes an individual who:

- i. Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
- ii. Is living in a motel, hotel, trailer park or campground due to a lack of adequate alternative accommodations;
- iii. Is living in an emergency or transitional shelter;
- iv. Is abandoned in a hospital; or
- v. Is awaiting foster care placement.

Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a car, park, abandoned building, bus or train station, airport, or camping ground;

Is a migratory child who in the preceding 36 months was required to move from one school district to another due to changes in the parent's or parent's spouse's seasonal employment in agriculture, dairy, or fishing work; or

Is under 18 years of age and absents himself or herself from home or place of legal residence without the permission of his or her family (e.g. runaway youth).

Note: this definition does not include an individual imprisoned or detained under an Act of Congress or State Law. An individual who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless.

A youth is in foster care if the individual:

Is in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 USC 677), or in an out of home placement.

This waiver extension request is to continue the previous waiver granted to the State of Minnesota, allowing it to reduce its required out of school expenditure rate from 75 percent to 60 percent so that it could address a gubernatorial priority of serving homeless youth and foster youth before they drop out of school. If this request is approved and extended, this waiver would be made available again to all

16 Local Workforce Investment Boards as an option, beginning in PY 2024. Across PY22 and PY23 Minnesota had seven LWDAs leverage the waiver opportunity.

II. GOALS THAT MINNESOTA AND ITS WORKFORCE DEVELOPMENT AREAS (WDAS) INTEND TO ACHIEVE AS A RESULT OF THE WAIVER:

The authors of WIOA recognized the special needs of out-of-school youth, especially those disconnected from school and/or work and who need extraordinary attention to get them on the path to economic and social self-sufficiency. DOL previously approved Minnesota's Homeless Youth/Foster Youth In-School Waiver request recognizing the significant barriers faced by these populations. **The goal of expanding the waiver request to include foster youth is to improve high school graduation rates and the entrance into post-secondary education for this at-risk population. WIOA Youth Service providers in each Minnesota county will identify foster youth in their jurisdictions and offer services to address unmet needs.**

Youth in and transitioning out of foster care have significant barriers to success and, unfortunately, many become homeless youth statistics. National data (National Fact Sheet on the Educational Outcomes of Children in Foster Care, National Working Group on Foster Care and Education, August 2018) indicate the following:

Percentage of foster care youth with more than one living placement	65%
Percentage of foster care youth who change schools when first entering foster care	31% - 75%
Percentage of 17-18 aged foster care youth with 5 or more school changes	34.2%
Percentage of 17-18 aged foster care youth who are consistently absent from school	Twice the rate for all 17-18-year-olds
Percentage of 17-18 aged foster care youth who are suspended from school.	Twice the rate for all 17-18-year-olds
Percentage of 17-18 aged foster care youth who are expelled from school	Three times the rate for all 17-18-year-olds
Reading level of 17-18 aged foster care youth	7 th grade; Some reports indicate that 44% read at the high school level
Percentage of 17-18 aged foster care youth who want to go to college	70% - 84%
Percentage of foster care youth receiving special education services	35.6% - 47.3%

Percentage of foster care youth who complete high school curriculum (or GED) by age 18; by age 21	41.8% - 63%; 65% (nationally: 86%)
Percentage of foster care high school graduates who enroll in college at some time	31.8% - 45.3% (nationally 69.2%)
Percentage of foster care college students who get a BA/BS degree	3%-10.8% (nationally 32.5%)

The Working Group also urged those who working with foster care youth to provide the following to ensure a successful educational experience:

- Support Students to Succeed and Graduate College
- Support Transition to College
- Support Adult Advocates

These components align with the 14 required program elements of WIOA. With increased resources given to WIOA's In-School Program (ISY), resulting from the approval of the renewal request, local service providers will be able to expand services to in-school foster children/teens. The Minnesota Department of Human Services (DHS) indicated in 2021 that over approximately 12,400 Minnesota youth were in foster care.

Many foster youth aging out of the system lack a source of income, access to housing, or healthy and reliable social supports. In examining the relationship between out-of-home placement and homelessness, the St. Paul, Minnesota based Wilder Foundation stated that 68% of homeless youth experience an "out of home placement," either a social service or corrections placement.¹ These movements were foster homes (most common), correctional facilities, and mental health institutions. Of those in a social service placement, 28% of the youth said they had run away from foster care, a group home, or other out of home placement, and 10% had to leave placement because they aged out.

The United States Department of Education (June 27, 2016) indicated that a "positive PK-12 education experience has the potential to be a powerful counterweight to the abuse, neglect, separation, impermanence and other barriers faced by youth in foster care." Attaining a postsecondary credential can enhance their well-being, help make successful transitions to adulthood, and increase the opportunity for personal fulfillment and economic self-sufficiency.

Reducing homelessness across Minnesota has been a priority for a number of years. The Wilder Foundation estimated that 11,371 Minnesotans were homeless, with 19,600 visiting a homeless shelter at least once during the year. Of this amount, children with parents (3,265) and unaccompanied youth under age 24 (1,484)

¹ Wilder Research: "Homelessness in Minnesota: Youth on their Own, Findings from the 2015 Minnesota Homeless Study," April 2017

constituted a little less of one half of the state’s homeless population. The Wilder Foundation reports that a more accurate estimate of the youth homeless population is 5,800 (youth under 17 years of age) and 7,300 (youth ages 18-24). The majority of homeless youth have chronic mental and physical conditions.

The Minnesota Department of Education has provided the number of homeless students statewide between the 8th and 12th grades:

DOL Program Year (7/1 to 6/30)	Number of Homeless 8 th -12 th Graders
PY 2022	14,494
PY 2023	10,019 (-31% from PY 2022)
PY 2024	10,697 (-7% from PY 2023)

WIOA youth service providers in Minnesota will continue coordinating with the various schools’ McKinney-Vento Program for the Homeless coordinators (see [Homeless McKinney Vento \(mn.gov\)](#) for information about the McKinney-Vento Program).

Homeless youth have difficulty in school (Minnesota Report Card, 2025)

Graduation Rate	Continuing	Dropped Out	Unknown
Statewide: 86.5%	7.80%	5.9%	4.4%
Homeless: 49.30%	23.70%	14.70%	12.30%
Test Standards: Reading Standard			
Exceeds	Meets	Partially Meets	Does Not Meet
Statewide: 13.9%	35.7%	20.6%	30.0%
Homeless: 3,10%	15.20%	20.4%	69.60%
Test Standards: Math Standard			
Exceeds	Meets	Partially Meets	Does Not Meet
Statewide: 16.7%	28.5%	22.5%	32.20%
Homeless: 2.6%	14.0%	15.6%	67.8%
Test Standards: Science			
Exceeds	Meets	Partially Meets	Does Not Meet
Statewide: 5.4%	20.7%	27.8%	33.60%
Homeless: 1.6%	4.7%	12.8%	81.0%

SPECIFIC GOALS FOR THE WAIVER:

Measure/Goal	PY 2024	PY 2025
Total Number of Foster Youth to be Served	130 (45 ISY)	135 (48 ISY)

Total Number of Homeless Youth to be Served	380 Homeless Youth	380 Homeless Youth
Increased School Attendance Rate for Homeless/Foster Youth	+10 Percent	+11 Percent
Increased Number of Foster Youth Earning Academic Credit for Work-Based Learning	+25 Foster Youth	+30 Foster Youth
Increased Number of Homeless Youth Earning Academic Credit for Work-Based Learning	+50 Homeless Youth	+60 Homeless Youth
Increased High School Graduation Rate for Homeless/Foster Youth	+10 Percent	+11 Percent
Increased Number of Homeless/Foster Youth Entering Post-Secondary Training	+15 Homeless/Foster Youth	+20 Homeless/Foster Youth
Increased Number of Homeless/Foster Youth Attaining Industry Recognized Credentials	+30 Homeless/Foster Youth	+40 Homeless/Foster Youth
Increased Number of Homeless/Foster Youth Who Participate in Work Experience or Internship in an In-Demand/High Growth Regional Occupation	+20 Homeless/Foster Youth	+22 Homeless/Foster Youth

Approval of this waiver will allow Minnesota's service providers to continue to develop services to address specific needs of homeless youth and foster youth at a time when they are at the greatest risk of becoming homeless. Minnesota's service providers will continue to leverage best practices like the Integrated Resource Team model to better support homeless and/or foster youth by convening key stakeholders in the youth's life. These teams may include social workers, parents/guardians, school personnel, etc. As with all youth, a core strategic component will be to have the ISS be youth-informed and led to ensure the youth is invested in their educational and employment success. The specific services will address the following needs identified by the Working Group on Foster Care:

- Support Students to Succeed and Graduate College
- Support Transition to College
- Support Adult Advocates

III. RELATIONSHIP OF GOALS TO THE MINNESOTA STATE PLAN:

One of the purposes of the State Plan is to describe how resources will be used to assist individuals who need assistance to become economic and socially self-sufficient. The populations (i.e. foster youth, homeless youth, pregnant/parenting

youth, youth with disabilities, etc.) cited in Minnesota's State Plan are those most in need of WIOA youth services.

The strategic vision of the One Minnesota Workforce Development Vision is a healthy economy where all Minnesotans have equitable access to a workforce development system in which partners across the state are working toward a collective goal of providing workforce development programs that are responsive to employer needs in in-demand occupations and lead to good jobs with family-sustaining wages.

Minnesota has identified the following goals in the 2024-2027 State Plan:

4. Increase interagency and local area coordination and alignment around shared goals, maximizing efficiency and coordination of workforce funding and programs and improving system integration, and creating a "no wrong door" approach for individuals or employers engaging in the workforce system.
5. Build employer-led industry-sector partnerships across the state to create or expand responsive and equitable workforce development programs and career pathways with embedded work-based learning or on-the-job training, including Registered Apprenticeships, focused on closing gaps in participation and representation based on race, ethnicity, disability, gender, veteran status, and age.
6. Create a more inclusive, equitable, accessible, and proactive workforce system to serve all Minnesotans, preparing employers and the current and emerging workforce for the changing nature of work including new and emerging technology, changing labor market demands, and for the state's shifting demographics, including our new Minnesotans.

In sum, the data show that current population and aging trends in Minnesota will lead to an extremely tight labor market over the next two decades – with some local areas already experiencing labor force declines. The challenges our state will face over the next 15 years are so great that we'll need to tackle them with a multi-pronged approach to attract and retain workers of all demographic characteristics. Retaining young talent, including homeless and foster youth, and removing barriers and increasing access to WIOA Youth programming is necessary to address these workforce challenges.

Because communities of color in Minnesota continue to grow faster than the white population, particularly in the younger working-age populations, the labor force will continue to diversify rapidly. Recognizing that the rapidly increasing share of existing workers are people of color, Minnesota's state plan recognizes that Minnesota must address this problem of persistent racial disparities directly. By approving this waiver, Minnesota's WIOA Youth service providers can better support this effort by support any BIPOC youth who are homeless or involved in the foster system.

This waiver allows Minnesota to target WIOA Youth resources to a population that is at-risk of homelessness, a group that is experiencing an opportunity gap. Data provided below in this waiver request highlights the success of efforts conducted under the previously approved waiver.

IV. ACTIONS THAT THE STATE HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS:

No State or local statutory or regulatory barriers exist that would prevent the implementation of this waiver.

V. DETAILED GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED:

Anticipated outcomes for youth targeted by this waiver (homeless in-school youth and youth in foster care):

- Increased school attendance rates
- Increased number of youths earning academic credit for work-based learning
- Increased high school graduation rates
- Increased number of youths entering post-secondary training
- Increased number of youths attaining credentials
- Increased number of youth who participate in work experience or internships in an in-demand/high growth regional occupation

DATA ON MN'S WAIVER TO OSY EXPENDITURE REQUIREMENT: FROM 75% TO 60% FOR MINNESOTA WDAS SERVING FOSTER OR HOMELESS YOUTH

Measure	PY23 Actual	PY24 Actual
Total Number of Foster Youth Served (Served 4/1/23 to 3/31/24)	103 (38 ISY)	124 (38 ISY)
Total Number of Homeless Youth Served (Served 4/1/23 to 3/31/24)	307 (51 ISY)	380 (76 ISY)
Number of Foster Youth High School Diplomas/GEDs (Exited/served - 4/1/23 to 3/31/24)	11-(7 ISY)	16 (11 ISY)
Number of Homeless Youth High School Diplomas/GEDs (Exited/served - 4/1/23 to 3/31/24)	12 (10 ISY)	19 (11 ISY)
Increased Number of Homeless/Foster Youth Entering Post-Secondary Training (Exiters only - 4/1/23 to 3/31/24)	19 Youth	16 Youth
Increased Number of Homeless/Foster Youth Attaining Industry-Recognized Credentials (Exited/served – 4/1/23 to 3/31/24)	91 (10 ISY)	67 (15 ISY)

Increased Number of Homeless/Foster Youth Who Participated in Work Experience or Internship in an In-Demand/High-Growth Regional Occupation (Exited/served – 4/1/23 to 3/31/24)	44 (12 ISY)	143 (48 ISY)

Data Source: Workforce One Advanced Search Results, 1/9/2024. Appropriate date ranges used with corresponding performance reporting dates.

ANALYSIS OF MINNESOTA ISY

HOMELESS/RUNAWAY YOUTH WAIVER

(ISYS W/<HS EQUIVALENT AND

HOMELESS/RUNAWAY AT ENROLLMENT)

PY 24 OUTCOMES

WIOA Youth Performance Measure	PY 24 Negotiated MN Goal	All Exiters PY 2024	Percent	PY 2024 ISY w/ITA	Pct. Of PY 24 MN Goal
Youth Employment/Education/Training Rate 2nd Quarter After Exit (7/1/23 to 6/30/24)	74.50%	75.5%	94.0%	25%	33.5%
Youth Employment/Education/Training Rate 4th Quarter After Exit (1/1/23 to 12/31/23)	74.90%	76.5%	96.0%	71.4%	95.4%
Credential Attainment Rate (1/1/2023 to 12/31/23)	62.0%	52.8%	95.3%	100%	161.3%
Measurable Skills Gain (7/1/24 to 6/30/25)	53.0%	56.0%	118%	66.7%	125.79%
Median Earnings Second Quarter After Exit (7/1/22 to 6/30/24)	\$5,400	\$4,440	119%	N/A	N/A

ISY/ITA YOUTH SERVED (7/1/24 TO
6/30/25) 15

ISY/ITA YOUTH EXITED (4/1/24 TO
3/31/25) 9

WIOA Youth Performance Measure	PY 23 Negotiated MN Goal	All Exiters s PY 23	Percent	PY 23 ISY w/ITA	Pct. Of PY 23 MN Goal
Youth Education/Employment/Training Rate Second Quarter After Exit (7/1/22 to 6/30/23)	69.0%	74%	107%	40%	58%
Youth Education/Employment/Training Rate Fourth Quarter After Exit (1/1/22 to 12/31/22)	69.0%	72%	104%	33%	48%
Credential Attainment Rate (1/1/2022 to 12/31/22)	62%	52%	84%	0.0%	0.0%
Measurable Skills Gain (7/1/23 to 6/30/24)	42.0%	57%	135.0%	50%	119%
Median Earnings Second Quarter After Exit (7/1/22 to 6/30/23)	\$4,000	\$5,970	149%	N/A	N/A

ISY/ITA YOUTH SERVED (7/1/23 TO
6/30/24) 17

ISY/ITA YOUTH EXITED (4/1/2 TO 3
3/31/24) 11

DATA SOURCE: ETA-9169 REPORTS,
RESPECTIVE YEARS

PROGRAM YEAR 2024 : SERVING FOSTER YOUTH

WIOA youth service providers maintain regular contact with youth shelters, youth opportunity centers, county social service agencies to recruit foster youth into WIOA. Minnesota's employment and training service to its foster youth population is further illustrated by the link below: <https://mn.gov/deed/programs-services/office-youth-development/special/shared-vision/>

In Program Year 2024, Minnesota's WIOA Youth Program served 124 foster youth. However, 43 of these individuals were classified as in-school youth. The new 60 percent out-of-school expenditure rate would permit Minnesota's youth service providers to increase services to foster youth who are in-school but most at risk of homelessness. This effort will reduce the current dropout rate and homelessness rate among the foster youth population. It also comes at a time where many at-risk youth (especially homeless and/or foster youth) continue to rely more on schools to provide food and support as the effects of the pandemic linger.

The expanded waiver will further Minnesota's needed efforts, as identified in the State Plan, to diversify its workforce given that the "in-school" foster youth population is becoming much more diverse.

ANALYSIS OF MINNESOTA ISY FOSTER YOUTH WAIVER

(ISYS W/<HS EQUIVALENT AND FOSTER YOUTH-CURRENT/PAST AT ENROLLMENT)

PY 24 OUTCOMES

WIOA Youth Performance Measure	PY 24 Negotiated MN Goal	All Exiters PY 2024	Percent	PY 2024 ISY w/ITA	Pct. Of PY 24 MN Goal
Youth Employment/ Education/Training Rate 2nd Quarter After Exit (7/1/23 to 6/30/24)	74.50%	75.5%	94.0%	100%	134%
Youth Employment/ Education/Training Rate 4th Quarter After Exit (1/1/23 to 12/31/23)	74.90%	76.5%	96.0%	100%	133.5%
Credential Attainment Rate (1/1/2023 to 12/31/23)	62.0%	52.8%	95.3%	100%	161.3%
Measurable Skills Gain (7/1/24 to 6/30/25))	53.0%	56.0%	118%	83%	157.23%
Median Earnings Second Quarter After Exit (7/1/22 to 6/30/24)	\$5,400	\$4,440	119%	N/A	N/A

ISY/ITA YOUTH SERVED (7/1/24 TO 6/30/25) **47** ISY/ITA YOUTH EXITED (4/1/24 TO 3/31/25) **17**

PY 23 OUTCOMES

WIOA Youth Performance Measure	PY 23 Negotiated MN Goal	All Exiters PY 23	Percent	PY 23 ISY w/ITA	Pct. Of PY 23 MN Goal
Youth Education/Employment/Training Rate Second Quarter After Exit (7/1/22 to 6/30/23)	69.0%	74%	107%	100%	145%
Youth Education/Employment/Training Rate Fourth Quarter After Exit (1/1/22 to 12/31/22)	69.0%	72%	104%	0.0%	0.0%
Credential Attainment Rate (1/1/2022 to 12/31/22)	62%	52%	84%	0.0%	0.0%
Measurable Skills Gain (7/1/23 to 6/30/24)	42.0%	57%	135.0%	67%	159%
Median Earnings Second Quarter After Exit (7/1/22 to 6/30/23)	\$4,000	\$5,970	149%	N/A	N/A

ISY/ITA YOUTH SERVED (7/1/24 TO 6/30/25) 8

ISY/ITA YOUTH EXITED (4/1/24 TO 3/31/25) 3

SOURCE: INTERNAL DEED DATA VIA FUTUREWORKS: ACCESSED 9-19-25

VI. ALIGNMENT WITH DEPARTMENT OF LABOR POLICY PRIORITIES

This waiver is in alignment with Department of Labor priorities as follows:

Connecting Education and Training Strategies

The intent of the waiver is to provide coordinated services to foster youth who are in-school and at risk of homelessness. Education and training services will be provided based on individual need. Integrated Resource Teams (IRTs) and the Guideposts for Success are integral parts of this effort.

Supporting Work-Based Learning

The expanded waiver will increase the number of youth aging out of foster care who participate in work-based learning. Targeted youth have the opportunity to work in high growth/in-demand jobs in regional economies.

Improving Job and Career Results

WIOA youth services to targeted youth will result in an increase in the number of youth who earn academic credit for work-based learning and the number of youth who attain industry-recognized credentials and enter post-secondary education.

VII. INDIVIDUALS AFFECTED BY THE WAIVER

Foster youth who are in-school but at risk of homelessness will be positively impacted by the expanded waiver. Youth from communities of color who are under-represented in the workforce are priorities in Minnesota's State Plan and they will be impacted by this waiver.

VIII. MONITORING/LOCAL COMMENT

Monitoring:

DEED's youth program staff will monitor the implementation of the waiver at the WDA level on a quarterly basis using FutureWorks, Workforce One, and Service Provider data. DEED's monitoring team will review the progress of waiver implementation. As required, DEED will report to DOL progress in achieving the waiver as well as any changes needed. Additionally, DEED will report information on the waiver and its outcome in Minnesota's WIOA Annual Report.

Local Comment:

DEED will ensure through direct communications and through its website that local comment (local Workforce Development Boards, Youth Committees, local business, and organized labor) is obtained on this waiver. Additionally, DEED staff will meet with local WDA/LWDB staff to obtain comments. DEED will inform the Department of Labor of any comments received.

Updated November 2025

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

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

ADULT PROGRAM PERFORMANCE INDICATORS

Performance 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	71.3%		71.3%	
Employment (Fourth Quarter After Exit)	67.7%		67.7%	
Median Earnings (Second Quarter After Exit)	\$7,882.00		\$7,882.00	
Credential Attainment Rate	70.0%		70.0%	
Measurable Skill Gains	61.0%		61.0%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	77.7%		77.7%	
Employment (Fourth Quarter After Exit)	76.8%		76.8%	
Median Earnings (Second Quarter After Exit)	\$12,309.00		\$12,309.00	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Credential Attainment Rate	74.3%		74.3%	
Measurable Skill Gains	66.9%		66.9%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	70.0%		71.0%	
Employment (Fourth Quarter After Exit)	70.0%		71.0%	
Median Earnings (Second Quarter After Exit)	\$4,000.0		\$4,000.0	
Credential Attainment Rate	62.0%		62.0%	
Measurable Skill Gains	44.0%		45.0%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE STAFF

1. DESCRIBE HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

The State of Minnesota will continue to utilize state merit staff employees to provide labor exchange services, also known as the Employment Service Program, under the Wagner-Peyser Act. The Job Service unit oversees these employees and ensures all services are provided as outlined under WIOA.

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

The state will use several professional development activities for Job Service staff:

- State-wide staff training on the provisions of Career Services to job seekers started in December of 2017 and will continue through 2027 with monthly webinars.

- Classroom presentation skills training based on the state's Creative Job Search workshop will continue to be offered to all employees who facilitate workshops.
- Staff are offered access to LinkedIn learning accounts and additional free and paid trainings as approved by their supervisor to maintain and enhance required skills.
- Training specific to each employee is documented in the employee's Individual Development Plan and supervisory file.
- Ongoing training in the areas of dealing with diverse populations, accessibility, safety, and financial literacy will continue to be offered to all employees.
- Training will continue to be provided in specific program areas such as Migrant Seasonal Farm Worker Services, Foreign Labor Certification, Fidelity Bonding, Work Opportunity Tax Credit program, and Trade Adjustment Assistance.
- The goal of these training activities is to ensure staff and managers are able to effectively assist job seekers with improving their job search skills, obtaining the best job possible, and progressing in a career pathway. These training activities will also provide staff and managers with the skills necessary to provide employers with access to qualified candidates and strengthen their businesses. The delivery methods of these trainings will include on-the-job training, conference calls, and online training using platforms like Teams, WebEx and Zoom.

In order to improve demand-driven workforce services to our businesses on both a state and regional level, six regional Workforce strategy Consultants serve employers in the state by developing, leading, and delivering demand-driven regional and statewide services, resources, and tools relating to recruiting, retaining, and developing talent for the regional economy.

This work includes developing workforce planning strategies and solutions for businesses, emphasizing talent pipeline development for key regional and statewide targeted industry sectors through regional collaboration and employer-led sector partnerships. The strategy consultants specifically focus on working with business leaders in targeted industry, high growth sectors providing family sustaining wages through analyzing labor market data and workforce planning needs and then developing customized strategies in the areas of: Engaging Community Partners & Stakeholders, Recruiting & Brand Awareness, Employee Inclusion & Career Opportunities, Onboarding, Training & Upskilling, and Diversity, Equity, Inclusion & Accessibility.

In addition to working directly with businesses, the Workforce Strategy Consultants initiate and build partnerships with community organizations, industry associations and education partners, to develop long term regional strategies to meet employer talent needs, connect employer to available resources, and serve as a bridge between regional and state workforce development and economic development entities. These staff also inform the development of the regional plan through sharing employer needs as well as assist in the implementation through the alignment of strategies, tools, and resources supporting businesses.

The Workforce Strategy Consultant team is located within the Economic Development division of DEED to better align with the needs of employers receiving services from their various projects, programs and initiatives, which often require job creation and workforce solutions.

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

At least once or twice a year, Unemployment Insurance Division staff participate in Job Service training webinars that all Employment Service program staff are required to attend. These trainings include the best ways to refer UI applicants to UI staff. Employment Services and WIOA staff are not involved in the identification of UI eligibility issues. Additionally, the state will use several professional development activities for Job Service staff:

- State-wide staff training on the provisions of Career Services to job seekers started in December of 2017 and will continue throughout 2024 and 2027 with monthly webinars.
- Classroom presentation skills training based on the state's Creative Job Search workshop will continue to be offered to all employees who facilitate workshops.
- Staff are offered access to LinkedIn learning accounts and additional free and paid trainings as approved by their supervisor to maintain and enhance required skills.
- Training specific to each employee is documented in the employee's Individual Development Plan and supervisory file.
- Ongoing training in the areas of dealing with diverse populations, accessibility, safety, and financial literacy will continue to be offered to all employees.
- Training will continue to be provided in specific program areas such as Migrant Seasonal Farm Worker Services, Foreign Labor Certification, Fidelity Bonding, Work Opportunity Tax Credit program, Unemployment Insurance, Veterans Employment Services, and Trade Adjustment Assistance.
- The goal of these training activities is to ensure staff and managers are able to effectively assist job seekers with improving their job search skills, obtaining the best job possible, and progressing in a career pathway. These training activities will also provide staff and managers with the skills necessary to provide employers with access to qualified candidates and strengthen their businesses. The delivery methods of these trainings will include on-the-job training, conference calls, and online training using platforms like Teams, WebEx and Zoom.
- When issues arise, staff connect UI applicants to the trained staff at the UI Call Center for questions about their eligibility and what constitutes acceptable job search activities.
- On rare occasions, when applicants are having trouble connecting, ES staff are able to forward the issue to the UI Supervisors who then expedite a connection for the applicant.
- On other rare occasions, when an applicant disclosed a potential compliance issue, ES staff refer them to UI staff to assure work search requirements are being met.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE
TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT
COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER
SERVICE

Local CareerForce location staff receive the training described in the prior section to provide assistance to UI claimants. Staff use this knowledge to assist the claimants in using computers

and phones available for use in the local CareerForce locations. The computers and phones give the claimants and local CareerForce staff direct access to the UI program and UI staff. UI Customer Service staff help individuals around the state, and around the country, apply for benefits.

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

Minnesota's strategy is centered on the Reemployment Services and Eligibility Assessment (RESEA) program. It's important to note that due to the state's low unemployment rate, ALL UI claimants who are seeking work (i.e. not attached to a job) are scheduled for RESEA sessions that are conducted by phone and are then referred to Wagner-Peyser staff. This helps ensure that the Wagner-Peyser program will have direct contact with all UI applicants in the state who are not attached to a job.

Minnesota's strategy in this area will be as follows:

- A Job Service staff person will contact every referral that results from an RESEA phone session that UI offers across the state. The UI program plans on offering RESEA sessions to all UI claimants who are not attached to a job.
- The RESEA and Job Service staff will conduct an assessment of every UI claimant to determine who will most likely need additional services from the CareerForce location.
- The Job Service staff person will conduct an orientation to CareerForce services by phone that includes information on how to register for the state's labor exchange system, i.e. MinnesotaWorks, and information about programs such as the Dislocated Worker program that they may be eligible for.
- The Job Service staff person will assist the RESEA customer with creating an initial registration and enrolling in the Creative Job Search workshop. Creative Job Search is typically the first job finding/job placement service that is offered to UI applicants. The workshop consists of training on how to find a job that includes career planning, preparing for the job hunt, skills identification, resumes and cover letters, applications and references, social media, interviewing skills, and more. These workshops are held both in-person and virtually.
- Job Service will follow up with UI applicants who are not enrolled in a program to ensure that they have a complete registration and resume in MinnesotaWorks, and that they are taking advantage of job placement services.

Wagner-Peyser services will also be available to all other unemployed individuals. Anyone can enroll in the job search classes offered to UI claimants, can access 1:1 staff assistance to obtain job search assistance, career guidance, labor market information, etc., and can use MinnesotaWorks.net to search for jobs. One of the strategies employed by Wagner-Peyser that is marketed and offered to all citizens are onsite hiring events and career fairs. These events have grown in popularity and will continue to be used as a vehicle to connect all job seekers with employers.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

The UI program strongly encourages all UI applicant participants to register with the state's labor exchange system, MinnesotaWorks.net, and create a resume. Once registered, job seekers have access to all of the online features such as searching for jobs and making their resume viewable by employers registered in the system. As described in the previous Section, RESEA participants, who represent ALL UI applicants who are not attached to a job, also receive information on Wagner-Peyser services, information and referrals to eligibility-based programs (such as WIOA Dislocated Worker), orientations to CF services, and workshop enrollments.

Planning is in process to move the labor exchange system into the newly created CareerForceMN.com website. Integrating these two websites into one system will bring additional value and resources to UI claimants.

Other unemployed individuals as well as universal customers have access to the same re-employment services. Staff-assisted services such as job search workshops, assistance registering with MinnesotaWorks.net, resume writing assistance, provision of labor market information, referral to veteran services, and referral to education, training, and supportive services are offered to all job seekers.

By providing RESEA Services to all non-job attached UI Recipients, Minnesota is meeting the requirements of WPRS by providing employment services to the required UI claimants including those most likely to exhaust benefits.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

State law does not require all UI claimants to register with MinnesotaWorks.net, however UI requires registration for RESEA program participants. As described earlier, Wagner-Peyser staff receive referrals from every RESEA phone session and provide follow up services with the intent of having every participant create a viewable resume in MinnesotaWorks.net.

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

In Minnesota, claimants no longer apply for benefits in person or stand in lines every two weeks to request their next benefit payment. ES staff no longer hand claimants slips of paper with referrals to "suitable" employment or give referrals to UI when individuals fail to take said employment.

Minnesota UI law establishes work search and work test requirements for UI claimants. Minnesota UI staff are trained on these requirements and have processes to detect when claimants might not be meeting these requirements.

Interactions between claimants and the UI Program are now mostly online, with some interactions by phone. Benefit payment requests are weekly. The UI Program is able to ask more questions of claimants and to identify potential ability and availability issues. When claimants have questions, they are able to receive assistance from trained staff at the UI Customer Service Center with virtually no wait.

After a claimant's RESEA session with UI staff, they are referred to ES for assistance with job search and offered other resources that could potentially aid them in looking for work, such as referrals to the Dislocated Worker Program, Veteran's Services and Vocational Rehabilitation.

When issues do arise, there is an open line of communication between the Job Service Field Director and the two Unemployment Insurance Supervisors.

ES staff refer claimants to the UI Customer Service Center for any questions related to their UI account, including potential eligibility issues. Trained UI staff assist claimants and raise issues as appropriate.

This is true whether or not claimants are involved in an RESEA session. UI staff run the RESEA program and work very closely with ES staff, who assist all claimants who attend RESEA sessions. UI and ES staff work to support all UI claimants in multiple ways, at multiple times, during each claimant's spell of unemployment. UI applicants receive information on Minnesota's CareerForce System, including the state's Job Bank (MinnesotaWorks.net), in UI application process, in the UI "handbook" mailed to all claimants, and by email. All UI claimant accounts have a work search "Self-Assessment and Work Search Plan". This includes information on and referral to all the same services that claimants receive when assisted by ES staff. W-P staff also have a central phone number to assist with any of the services.

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

All UI claimants who are not attached to employment are provided information about the availability of training and education programs at the RESEA session. This includes an explanation of how the UI claimant, if eligible, can qualify for and receive training.

Customers who would like further information about training are assisted either by Job Service staff to gain more information and application assistance, or by program staff if the customer is eligible for a WIOA or state funded program. This same information is provided to all other unemployed individuals and the universal customer by either self-service (information provided at the CareerForce location or online links to training programs) or with staff assistance.

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.

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~~Page 186~~ 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.

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Minnesota Agricultural Outreach Plan portion of the State Plan details the strategies for providing services to the Migrant and Seasonal Farm workers (MSFWs) community, for the period of ~~July 1, 2024, to June 30, 2025~~ July 1, 2025, to June 30, 2026, as described in Wagner-Peyser, as set forth in regulations 20 CFR 653.107, WIOA Sections 102 and 103, and the Unified Planning Guidance.

In ~~PY 24~~ PY 25, the Department of Employment Economic and Development (DEED) will continue to provide Wagner Peyser services to MSFWs with a full range of employment services

and referrals to other community services. The full range of services provided includes job search assistance ~~and placement~~, ~~job~~ ~~career~~ counseling, training opportunities, and referrals to supportive services and programs. The program is administered by a Job Service supervisors who lead the Agricultural Outreach Representatives (AORs). AORs are fluent in both English and Spanish, to better serve the predominantly Spanish-speaking MSFWs. In addition, DEED, will ensure that the full range of services provided to MSFW populations are qualitatively equivalent ~~and quantitatively proportionate~~ to the services provided to non-MSFWs. To ensure statewide compliance, the agency will make every effort to meet the Migrant Indicators of Compliance.

Migrant labor participation is concentrated between the months of May to October, based on the growing or harvesting of the crops and the arrival of farm workers attempting to secure housing for the season. The use of mechanization and chemicals in the state has reduced the number of farm workers needed per acre in fieldwork. Many migrant farm workers have continued to take advantage of other longer-term employment opportunities in vegetable, meat, and poultry processing companies. Farmers have also opted to use more of the H-2A foreign workers to ensure that they are able to obtain the needed workers and that the ~~175~~ workers will remain throughout the period needed by the employer. As a result, there have been less opportunities for domestic workers to obtain farm work that includes housing that is not H-2A housing. Migrant farm workers tend to travel with their families, including young children, and lack of housing for their families results in fewer migrant families traveling to Minnesota in search of farm work.

Historically workers return to areas where they have established relationships and are encouraged to seek services from the Agricultural Outreach Representatives at the CareerForce locations. Therefore, it is difficult to provide an exact number of migrant farm workers in this state. The ~~most recent 2022~~ Census of Agriculture ~~was in 2022~~ (released in February 2024) reports that there were 4,641 migrant farm workers, in Minnesota, reported by farmers using their payroll records. This number is from self-reporting and may not reflect the number of farm workers that work in food processing, smaller farms and operations, and farm workers that were not counted due to non-participation of farmers in the 2022 Census of Agriculture. The total number of registered Migrant and Seasonal Farm Workers in the last full program year PY242, was ~~352-257~~ compared to ~~298-395~~ registered in PY231.

Currently, some of the largest agricultural employers in Minnesota include: Southern Minnesota Beet Sugar Cooperative (SMBSC), Lakeside Foods, Seneca Foods, and ~~Bird's Eye Foods~~ ~~Conagra~~. Smaller agricultural employers include potato farmers, strawberry farmers, Syngenta (seed company), farmers who hire for rock pickers, smaller vegetable farmers (cucumber, cabbage, zucchini), apple farmers, and nurseries who hire seasonal workers. A concern heard from the majority of these agricultural employers is the difficulty in obtaining farm workers due to the lack of housing in their rural areas. Small farmers and larger agricultural employers are not generally willing to provide housing for domestic workers. Larger employers that have used H-2A workers are leading the industry in Minnesota when it comes to providing housing to ~~H-2A workers~~ but only within ~~the H-2A that~~ program. A need for farm worker housing for domestic workers is a need that has not been ~~met~~ ~~accomplished~~ by our state.

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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) ~~Page 187~~ 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

Minnesota is a leading state in annual farm income. It ranks at ~~75~~ among the states, generating about 4% of the nation's total agricultural receipts. In terms of revenue generated Minnesota's top five agricultural products are corn ~~for grain~~, hogs, soybeans, dairy products, and cattle and calves. ~~Livestock and livestock products account for about half of the state's farm income.~~ The most valuable livestock products are hogs, accounting for ~~48~~13% of the state's total agricultural revenues (-Source: [U.S. Department of Agriculture, 2025 Minnesota Agricultural Profile 2023](#)). Minnesota has ~~68,822~~67,100 farms totaling ~~25,516,982.4~~ million acres of the state's 50 million acres. The average farm size is ~~374-379~~ acres. Minnesota's growing season varies depending on where you are in the state: 100 days in the north to 150 days in the south. The Agricultural and Food Industry is the 2nd largest employer in Minnesota with (2/3) two-thirds of all agricultural jobs are off-farm, in processing, distribution, supply and service sectors. This type of employer hires domestic workers who travel, primarily, from the southern portion of the U.S., specifically, Texas, and work seasonally for this industry. There is not a shortage of workers for this industry. Minnesota has seen an increase in the implementation of H-2A workers in the more traditional farm work and nursery type work and ~~the~~ dairy industry. Employers implementing the H-2A program, in these industries, report they have some shortage of workers and thus, turn to H-2A for labor. Minnesota is a top producer of frozen and canned vegetables. Corn is the state's most valuable crop followed by soybeans. Minnesota's leading fruit crop are apples. Minnesota leads the nation in producing sugar beets, turkeys, oats, and sweet corn and green peas for processing. The state is second only to California in wild rice production. Minnesota is unique in the production of wild rice with it being cultivated paddy wild rice and traditional Native American hand harvested wild rice. The state is also a major producer of spring wheat, canola, hogs, dry beans and milk cows.

-The top crops and months of heavy activity include:

- Sugar beets, NW/SW MN, June-October
- Vegetables, SE MN April-October
- Potatoes, Statewide, March-October
- ~~→~~→Corn, Central/Southern, June-September
- Soybeans, Central/Southern, June-August
- Apples, SE/Metro, July-October

3. AN

~~A~~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 YEARROUND 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

The US Bureau of Labor Statistics does not have farm labor data for Minnesota. The US Department of Agriculture has data on the “Lake” region which includes Minnesota, Michigan, and Wisconsin. In July of 2023, 59,000 farmworkers were employed in the region and January of 2023 (off season), 19,000 farmworkers were employed (source: USDA). In Minnesota in 2022, there were approximately 3,455 agricultural workers on H-2A visas, which is nearly double the number of H-2A workers that came to Minnesota five years ago (source: Farmworker Justice). The 2022 USDA Census of Agriculture found that there were 72,097 total farm workers in the state, with the highest concentrations in Stearns and Polk Counties [\(this is the most recent data\)](#). These differing numbers from the Lake region and the state could be reflective of the highly mobile status of the migrant and seasonal farm worker population within the total farm worker population and are point in time counts.

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According to the National Agricultural Workers Survey (NAWS) from 2019-2020:

- County of Origin/Ethnicity: About two-thirds (63%) of farmworkers interviewed were born in Mexico, 30 percent were born in the United States or Puerto Rico, 5 percent were born in Central America, and the remainder originated from South America, the Caribbean, Asia, and the Pacific Islands. Seventy-eight percent of all farmworkers were Hispanic. Among U.S.-born farmworkers, 32 percent were Hispanic. In terms of race, nearly one-third of farmworkers self-identified as White (33%), and nearly two-thirds categorized their race with an “other” response (66%). Ten percent of farmworkers were self-identified as indigenous.
- Gender/Age: Males comprised 66 percent of farmworkers in 2019–2020. Farmworkers had an average age of 41. Thirty-seven percent of farmworkers were under the age of 35, 44 percent were ages 35 to 54, and 19 percent were age 55 or older.
- Language: 62% of NAWS respondents said that Spanish was the language in which they were most comfortable conversing, 25% said English was, 6% said both Spanish and English.
- Housing: The proportion of workers living in employer-provided housing varied across the Eastern, Midwest, and Western migrant streams—the Midwest stream had the highest percentage of workers in employer housing at 31%, the Eastern stream has 18%, and the Western stream had 10%.
- Minnesota served ~~298-395~~ registered MSFWs for ~~PY21-PY23~~ and ~~352-257~~ registered in PY24~~2~~. In PY21, 98.9% of those MSFWs identified as a person of Hispanic or Latino ethnicity compared to 98.7% in PY22. Gender breakdown showed 48.6% reporting male gender and 51.4% reporting female gender, in PY22. Data records show that in PY22, 86.7% of MSFWs identified as migrant farm workers versus seasonal farm worker, with 87.5% identifying as migrant farm workers in

PY21. The majority of the MSFWs registered identified a language barrier for a total of 65.6% in PY22.

-The primary language identified for 80.7% of the MSFWs was Spanish and 65.8% of registered MSFWs identified as having dropped out of high school in PY22. Migrant labor participation is concentrated in the months between May-October based on the growing or harvesting of the crops. The use of mechanization and Roundup Ready chemicals in the state has greatly reduced the number of farm workers needed in fieldwork. Many farm workers have continued to take advantage of other longer-term employment opportunities in vegetable, meat, and poultry processing companies.

-Since some workers return seasonally to areas where they have established employer relationships, they do not seek the services of the local one-stop CareerForce location. This and other barriers such as language and [fear of government reluctance to engage with government](#) make it difficult to provide an actual number of migrant farm workers in this state. The farm workers working in Minnesota are primarily employed by food processing companies which include canning, packing and processing poultry or meat for consumption. Food processing companies recruit the workers in Texas every spring. The migrant food processing workers arrive to the work sites in Montgomery, Glencoe, Blue Earth, Brooten, Owatonna, Plainview, and other locations in MN.

The period of lowest MSFW activity in Minnesota is between the months of January – March. Migrant farm workers begin to arrive in Minnesota in late April to attempt to secure their housing and this is oftentimes weeks prior to when their seasonal farm work begins.

-The migrant farm worker stream in Minnesota continues to evolve with workers only wanting to assist with seasonal crop production and returning home in the off-season. Employment opportunities have shifted from actual field work to more food processing, thus changing the dynamics that makes employment more predictable based on the [Page 189](#) growth season. Workers are recruited prior to seasons, as producers recruit in Texas. Farm workers are less interested in staying in Minnesota for training, due to family members elsewhere and climate reasons.

-Most of the farm worker housing is dedicated to contracted adult workers or is severely limited in availability for migrant families. The inability to pay for housing in non-farm worker housing results in fewer migrant workers remaining in Minnesota which has caused employers to struggle with their farm worker labor needs.

Seasonal farm workers are more likely to consider training for other occupations and to take advantage of the services provided at the AJCs due to their established residence in Minnesota. Migrant farm workers are faced with high [costs](#) for housing, language barrier, and limited family roots in Minnesota. This affects the level of interest in committing to training opportunities in Minnesota. Short-term training opportunities provided by Motivation Education & Training (MET), our NFJP partner, are more attractive to migrant farm workers because they can take advantage of those opportunities in their state of residence and not necessarily just in Minnesota.

~~4.4.~~ OUTREACH ACTIVITIES THE LOCAL OFFICES OUTREACH ACTIVITIES ~~MUST BE~~ 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:

Agricultural outreach representatives (~~aors~~AORs) who are state merit staff, conduct outreach ~~and~~; listening sessions ~~and to~~ build authentic relationships ~~building~~ with ~~msfws~~MSFWs with fairness and respect. When the agricultural outreach representative (~~aor~~AOR) conducts outreach, the ~~msfw~~MSFW program (bilingual) resource guide provides local staff and agency contact information to the ~~MSFW~~msfws. The information is important and sometimes crucial to ~~MSFW~~msfws, whether they are seeking agricultural or non-agricultural employment and services. The ~~aor~~AOR posts contact information with local businesses and agencies that are frequented by the ~~MSFW~~msfws, and this information includes tear-off tabs with their names and phone numbers. These postings are written in ~~english~~English and ~~spanish~~Spanish. This is consistent with our commitment to universal access to labor exchange services and the requirement to ensure that all job seekers with ~~lep~~LEP and/or little or no computer knowledge or access to computer-based labor exchange services will be provided services and assistance.

The AORs target early outreach efforts prior to the ~~high~~ peak season, ~~at its highest point~~. This is to make contact with MSFWs during a time when they ~~are~~ not yet started working and to be able to connect them to support services in the area and to review AJC services ~~and~~ information ~~and which includes provide~~ farm worker rights and complaint process information. Once the MSFWs begin working they are difficult to meet with as their work schedules become a priority. Having access to farm workers prior to the ~~peak season~~peak season allows the AORs to invite the farm workers into the AJCs so that they become more familiar and comfortable with seeking services available at the AJCs. This includes job seeking services and training opportunities.

-Outreach activity is concentrated in the summer and fall months when MSFW activity is at its peak. Many of the workers that the outreach staff make contact with are food ~~processor~~ processing workers that are recruited and contracted in Texas by employers. They arrive to work in ~~three varying shifts of~~ 8-to-14 hour ~~shifts~~ during (June-October) the peak season.

-There are four one-stop CareerForce locations in Faribault, Mankato, Rochester and Willmar with significant MSFW activity in Minnesota. These CareerForce locations include a bilingual Spanish/English AOR, all of whom are bilingual / bicultural, have farm worker backgrounds and a strong commitment to their work. The AOR outreach staff perform outreach activities during the peak time of the season including scheduling and coordinating outreach efforts with the other service providers. The outreach staff provide the farm workers and employers with information, presentations, and handouts related to employment rights and protections (~~including the complaint process~~), job referrals and job search services. The majority of MSFWs encountered by the AORs and other service providers (~~Community Health Service, Inc. Migrant Community Health Services~~, Agricultural Worker Project of SMRLS-, NFJP) indicated that they are limited English (LEP) or non-English speakers. The outreach staff assist MSFWs with translation, program registrations, referral to the Unemployment Insurance Program if needed, and provide and inform workers of all employment services to those who qualify. The staff provides informational resource guides that include eligibility information for all agency

partners, and local community resources. Services will be actively promoted to farm workers as described above under the local outreach plan.

Collaborating with partner agencies and organizations that provide service to MSFWs is a vital key to serving MSFWs in Minnesota. AORs are available to attend parent meetings at Tri-Valley Opportunity Council, Inc. (migrant schools) throughout Minnesota. These meetings are scheduled to accommodate the work schedules of the MSFWs and are a perfect opportunity for AORs to meet farm workers and present MSFW information and provide services; on-site.

Collaborative work also includes working with the [cCommunity hHealth](#) staff and traveling to different locations to address the needs of the MSFWs who do not have medical coverage and cannot afford medical coverage. AORs provide translation services for [cCommunity hHealth](#) staff and can provide MSFW information and complete registrations for MSFWs, on-site. These collaborative efforts/events are scheduled at migrant housing camps and public parks where AORs can strategically gain access to otherwise non-accessible farm workers.

-AORs will often extend outreach invitations to enforcement agencies to these events and when appropriate. Employer owned housing is difficult to access and thus in those situations outreach focuses on distributing the information for partner agencies/enforcement agencies to maintain a working relationship with the employers. Local food shelves, churches and any other opportunities that arise for outreach are always considered for outreach workers to provide the required services to farm workers. Attending local community meetings and providing information on the MSFW population is a key role for our outreach efforts.

-The outreach staff in the four significant local offices develop a yearly outreach plan which, in part, describes the coordination and referral system with other local community MSFW service providers and partners. This includes setting goals and objectives on employer and worker contacts, registration number of workers, job referrals and following-up on referrals to record results, increasing the number of employer visits and making contacts for job development and making assessments of the needs of farm workers and employers. These plans are monitored by the State Monitor Advocate (SMA) as part of the office review process to ensure that MSFWs and employers have full access to all CareerForce services. Additionally, the [se](#) goals align with DEED's values and mission statement.

-Outreach workers (AORs) work with the Rapid Response team when a food processing company is permanently closed. They coordinate with the Rapid Response team to be able to present information on the MSFW services provided by the AORs and they are able to present this information in Spanish. AORs also coordinate this type of event to include the NFJP partner and include them in the presentation provided to the workers.

A.A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES

When the Agricultural Outreach Representative (AOR) is conducting outreach, the MSFW Program (bilingual) Resource Guide provides local staff and agency contact information to the MSFWs. The information is important and sometimes crucial to MSFWs, whether they are seeking agricultural or non-agricultural employment and services. The AORs post contact information with local businesses and agencies that are frequented by the MSFWs, and this information includes tear-off tabs with their names and phone numbers. These postings are

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written in English and Spanish. This is consistent with our commitment to universal access to labor exchange services and the requirement to ensure that all job seekers with LEP and/or little or no computer knowledge or access to computer-based labor exchange services will still be provided services and assistance.

~~Page 191~~ The AORs conduct early outreach efforts prior to the ~~high~~ peak season at its highest point. This is to contact MSFWs during a time when they not yet started working and to be able to connect them to support services in the area and to review AJC services information and provide farm worker rights and complaint process information. Once the MSFWs begin working they are difficult to meet with as their work schedules become a priority. Having access to farm workers prior to the ~~peak season~~ peak season allows the AORs to invite the farm workers into the AJCs so that they become more familiar and comfortable with seeking services available at the AJCs. This includes ~~job seeking~~ job-seeking services and training opportunities.

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-Outreach activity is concentrated in the summer and fall months when MSFW activity is at its peak. Most of the workers that the outreach staff make contact with are food processor workers that are recruited and contracted in Texas by employers. They arrive to work in ~~three~~ 8-to-14-hour shifts during (June-October) the peak season.

-There are four one-stop CareerForce locations with significant MSFW activity in Minnesota. These CareerForce locations include a bilingual/bicultural Spanish/English AOR, ~~all of whom are bilingual / bicultural who~~ who, have farm worker backgrounds and a strong commitment to their work. The AOR outreach staff perform outreach activities during the peak time of the season including scheduling and coordinating outreach efforts with the other service providers. The outreach staff provide the farm workers and employers with information, presentations, and handouts related to employment rights and protections, job referrals and job search services. The majority of MSFWs encountered by the AORs and other service providers (Migrant Health, Legal Services, NFJP) indicated that they are limited English (LEP) or non-English speakers. The outreach staff assist MSFWs with translation, program registrations, the Unemployment compensation application process if needed, and provide and inform workers of all employment services to those who qualify. The staff provides informational resource guides that include eligibility information for all agency partners, and local community resources. Services will be actively promoted to farm workers as described above under the local outreach plan.

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In addition to the designated significant areas, the state is dived into four regional areas (NW, NE, SW and SE) to assure the entire state has coverage. This is cooperation with existing ES staff.

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-Collaborating with partner agencies and organizations that provide service to MSFWs is a vital key to serving MSFWs in Minnesota. AORs are available to attend parent meetings at Tri-Valley Opportunity Council, Inc. (migrant schools) throughout Minnesota. These meetings are scheduled to accommodate the work schedules of the MSFWs and are a perfect opportunity for AORs to come into contact with farmworkers and present MSFW information and provide services, on-site. Collaborative work also includes working with the Community Health staff and traveling to different locations to address the needs of the MSFWs who do not have medical coverage and cannot afford medical coverage. AORs provide translation services for Community Health staff and are able to provide MSFW information and complete registrations

for MSFWs, on-site. These collaborative efforts/events are scheduled at migrant housing camps and public parks where AORs can strategically gain access to otherwise non-accessible farm workers.

-AORs extend outreach invitations to enforcement agencies to these events and when appropriate. Employer owned housing is difficult to access and thus in those situations outreach focuses on distributing the information for partner agencies/enforcement agencies to maintain a working relationship with the employers. Local food shelves, churches and any other opportunities that arise for outreach are always considered in order for outreach workers to provide the required services to farm workers. Attending local community meetings and providing information on the MSFW population is a key role for our outreach efforts.

-The outreach staff in the four significant local offices develop a yearly outreach plan which, in part, describes the coordination and referral system with other local community MSFW service providers and partners. This includes setting goals and objectives on employer and worker contacts, registration number of workers, job referrals and following- up on referrals to record results, increasing the number of employer visits and making contacts for job development and making assessments of the needs of farm workers and employers. These plans are monitored by the State Monitor Advocate (SMA) as part of the office review process to ensure that MSFWs and employers have full access to all CareerForce services.

-Outreach workers (AORs) work with the Rapid Response team when a food processing company is permanently closed. They coordinate with the Rapid Response team to be able to present information on the MSFW services provided by the AORs and they disseminate this information in Spanish. AORs also coordinate this type of event to include the NFJP partner and include them in the presentation provided to the workers.

B.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.*

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Minnesota has a specialist position dedicated as a year-round full-time State Monitor Advocate (SMA) and four ~~fulltime~~ Agricultural Outreach Representatives (AORs) that provide full-time outreach during the peak season of May to October as well as additional outreach as appropriate to remaining MSFW populations during the off season. The SMA provides training for the outreach workers (AORs) including ~~ing~~ an orientation on the WF1 (MIS) system components and the integration of the MSFW Program within WF1 to effectively and efficiently ensure the documentation of the full range of employment, career and training services provided to the farm workers. The SMA conducts an annual Pre-Season training for the AORs

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~~and which includes~~ agencies such as the Department of Labor and Industry, Office of Attorney General, Agricultural Workers Project, ~~c~~Community ~~h~~Health ~~organizations~~, Tri-Valley Opportunity Council, Inc., and NFJP partner are presenters and/or attendees. UI staff are also invited to present and discuss the unique needs of the MSFW population as it applies to their UI benefits and the role of the outreach worker. Quarterly meetings are scheduled for MSFW staff to address any areas of concern and/or to review training materials received from federal trainings attended by the SMA. The SMA also provides technical assistance to AJC staff throughout Minnesota and to the AORs, as needed. NFJP partner, MET staff, are invited to participate and provide input on the MSFW population that we both serve and how we can work together to provide services.

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The AORs also receive updated training on customer services, workshops on Dislocated Worker programs, ~~e~~Employer services, SNAP, MFIP, ~~j~~Job ~~f~~Fairs, and WIOA compliance. The AOR staff are invited to ~~and~~ do presentations at company's Employee Orientations for the food processors, facilitated by the food processing companies. AORs (~~agricultural~~ outreach workers) were able to attend the National MAFO conference to receive training on issues concerning and affecting farm workers. The National MAFO conference was also attended by the NFJP partner. This training opportunity also provided valuable networking opportunities with other outreach workers from across the U.S., and other SMAs, and the National Monitor Advocate and Regional Monitor Advocate. The SMA will continue to promote the attendance of AORs to this valuable training opportunity. AORs also participate in DOL training opportunities and contribute to the discussions on how to best meet the needs of MSFWs in our state.

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The SMA is positioned as a senior level advisor, reporting directly to the CareerForce Director which ensures no conflicting duties and protects the position from retaliation.

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~~C.G.~~ INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES

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Agricultural Outreach Representatives are also required to attend monthly training webinars. These are known as Job Service training webinars and feature regular updates about providing Career Services as defined in WIOA. Additionally, these trainings focus on ~~additional~~ resources, best practices, strategies and concepts. The focus is usually related to providing services funded by the Wagner Peyser Act. Furthermore, an annual update about Migrant and Seasonal Farm Worker program is featured on these training webinars.

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UI staff are invited to the MSFW Pre-Season trainings to offer updates on UI and UI processes. UI informational brochures are available for distribution by AORs in Spanish and other languages. This information is reviewed by the AOR with MSFWs to provide all information in the MSFWs native language. ~~Page 193~~

~~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

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~~To~~ Minnesota employs State Merit Staff to ensure that MSFWs receive AOR staff provides the same professional, high-quality services ~~to as~~ employers and job seekers. The SMA provides technical assistance and support to the outreach staff on outreach for the MSFWs and related

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functions, including Pre-Season Trainings on topics related to the MSFW program including Complaint Process, ~~MSFWs~~, and state, and federal regulations affecting the MSFW customer. The SMA provides onsite reviews of local services provided to MSFWs. The SMA and AORs train local staff and provide technical assistance to enhance services to MSFWs (e.g., introducing migrants and other customers to office technology, and offering translation assistance within local communities). Additionally, the SMA performs the following required activities:

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- Conducts annual State-level reviews of one-stop centers and career center services and protections provided to MSFWs.
- Consults with State and local staff to ensure accurate reporting of MSFW-related information.
- Compiles and reports on all statistical and other MSFW-related data reported by agricultural offices quarterly.
- Reviews proposed State directives, manuals, and operating instructions that pertain to MSFWs.
- Participates in federal monitoring reviews.
- Prepares an annual summary report of statewide services.

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The outreach workers (AORs) participate in the annual Pre and Post Season MSFW Program training, which is developed and facilitated by the State Monitor Advocate (SMA). The emphasis of the training includes outreach efforts, coordination with other agencies, the Complaint Process and the rights and protections afforded to MSFWs by state and federal laws. The NFJP, Motivation, Education and Training (MET, Inc.) staff is always invited to attend and present at the annual trainings. The MET staff work in partnership and collaboration with the outreach staff to deliver services and community information and resources to MSFWs and employers.

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The training also includes information on services and training provided by the local CareerForce locations and all agency partners. Enforcement agencies are also invited to attend and present at the ~~post-season~~ training, including Wage and Hour, OSHA, Labor & Industry, Human Rights, Legal Services, Department of Transportation, and EEOC. The information presented and obtained from these agencies is vital and important when providing agency referrals to the farm workers.

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E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS

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The Minnesota Department of Employment and Economic Development has a Memorandum of Understanding with Motivation, Education and Training, Inc. (MET) the NFJP grantee since 1997. The collaboration includes team outreach days to the farm worker camps, and informational meetings held for the workers. The NFJP staff ~~are~~ invited to attend bi-weekly team meetings ~~with~~ MSFW outreach staff and present at the SMA pre-season training.

MET, Inc. staff are invited and participate in conference call meetings and quarterly meetings with MSFW staff to provide input on status of funding for training and support services offered to MSFWs by MET, Inc.

The following data is derived from the NFJP database of MET, Inc., who is an NFJP grantee for the state of Minnesota. The NFJP services and referrals were provided to farm workers across a large area stretching from the counties of Kandiyohi, Brown, Blue Earth, Waseca, Steele and

Olmsted in the southern half of the state. NFJP services were also provided in the western counties of Clay and Wilken.

• PY 2019 (7/1/2019 to 6/30/2020), the number of MSFW contacts by NFJP partner with Minnesota Department of Employment and Economic Development (DEED) reached 510 farm workers.

• PY 2020 (7/1/2020 to 6/30/2021), the number of MSFW contacts by NFJP partner with Minnesota Department of Employment and Economic Development (DEED) reached 299 farm workers.

• Program Year 2021 (07/01/2021 – 06/30/2022): 360 farm workers

• Program Year 2022 (07/01/2022 – 06/30/2023): 400 farm workers

NFJP is a co-located partner in the Willmar CareerForce and the Monticello-Mankato CareerForce locations, ~~and are also located in the Clay County Social Services building which is the location of the Moorhead CareerForce.~~ Their main office is located in Waseca, Minnesota, which is located in the southeastern portion of Minnesota.

The outreach staff in the four significant local offices develop a yearly outreach plan which, in part, describes the coordination and referral system with other local community MSFW service providers and partners. This includes setting goals and objectives on employer and worker contacts, registration number of workers, job referrals and following-up on referrals to record results, increasing the number of employer visits and making contacts for job development and making assessments of the needs of farm workers and employers. These plans are monitored by the State Monitor Advocate (SMA) as part of the office review process to ensure that MSFWs and employers have full access to all CareerForce services.

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:

I. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWs THROUGH THE ONE-STOP CENTERS

II. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES

DEED and MSFW Services' goals are to ensure that MSFWs are offered meaningful employment services; and information on benefits and protections, including counseling, ~~testing~~assessments, and job training referral services. These services are always equivalent and proportionate to services provided to non-MSFWs. Agricultural Outreach Representatives assist with ~~work program~~ registration, ~~and~~ job leads and provide information about the

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complaint system and assistance with submitting complaints and referrals for supportive services in the language of the significant proportion of the States Migrant Seasonal Farm Worker population.

MSFWs are provided the full range of employment services by Agricultural Outreach Representatives (AORs) who meet with MSFWs directly at CareerForce locations and where they live and work, on an as-needed basis. Information provided to MSFWs includes the MSFW Program (bilingual) Resource Guide which provides staff and agency contact information. The information is important and sometimes crucial to MSFWs, whether they are seeking agricultural or non-agricultural employment. In addition to the full range of CareerForce services information, the Resource Guide provides a listing of resources such as: education services, food shelf contact information, health services including vaccination information, legal services, labor and workplace resources, and government agencies information. If needed services are not available through CareerForce, the AOR's will then make referrals to other agencies and organizations that are able to provide the appropriate assistance.

Through established and newly formed relationships AORs are frequently scheduling outreach events at local businesses, schools and community-based agencies that are frequented by the MSFWs. AOR's share business cards ~~Page 195~~ and post contact information including tear-off tabs with their names and phone numbers. These postings are written in English and Spanish. This is consistent with our commitment to universal access to labor exchange services and the requirement to ensure that all job seekers with LEP and/or little or no computer knowledge or access to computer-based labor exchange services will still be provided services and assistance. There are ~~556~~ one-stop CareerForce locations throughout Minnesota. CareerForce programs are targeted to those receiving UI benefits, dislocated workers, low-income adults, disadvantaged youth, welfare-to-work participants, Veterans, Justice-Involved individuals, and low-income seniors. However, any person who lives in Minnesota can use their services. The centers offer many different classes and workshops. The locations also have services geared specifically for veterans, and Justice Involved individuals, including networking groups, job clubs, ~~and~~ reintegration training ~~and~~ workshops to help with job search and career planning. Examples of workshops include:

- Interviewing skills
- Networking
- Internet job searches
- Completing job applications
- Resumes and cover letters

The SMA and AORs will continue to hold informational meetings throughout the ~~high~~-peak season at the camps to provide information relevant to the MSFWs such as the Employment Service Complaint Process, referral to the Unemployment Insurance Program, and the full range of employment services available at the local CareerForce Locations. The meeting notices are posted in advance and held in the evening and ~~or~~ on the weekend to accommodate shift work schedules. Other MSFW service provider agencies are invited to collaborate and present information regarding agency service eligibility, type of services offered and benefits available. The meetings are well attended by the workers and their families and provide the outreach workers and community partners an opportunity to exchange agency contact information with other agency staff. AORs will also call or text MSFWs to let them know that

they will be available to meet with MSFWs at their residence (housing camps) or location of outreach event.

-The AORs continue to contact farm workers at their work sites, living areas and gathering places. The AORs collaborate with advocacy groups and enforcement agencies including County Social Service agencies providing supplemental nutrition assistance program (SNAP), Migrant Education centers, [Community Health Service, Inc. Health Service centers](#), local community agencies, Migrant Head Start, The Agricultural Worker Project of Southern Minnesota Regional Legal Services, Wage and Hour, Department of Labor and industry, Department of Health, and other service providers to enable them to provide outreach and locate farm workers that are missed through CareerForce outreach efforts. The cooperative referral arrangements with these agencies are based on long-standing agreements. Minnesota has a Memorandum of Understanding with Motivation, Education and Training, Inc. (MET) the NFJP grantee.

-Outreach staff contact agricultural and non-agricultural employers, providing them with information about the employment services available for employers such as posting jobs, viewing resumes, hiring priority targeted populations, apprentice programs, Federal WOTC Tax Credit and Bonding programs and local Job Fairs. We distribute informational pamphlets directed to agricultural and non-agricultural employers that include contact information for the local Workforce Strategy Consultants. The SMA visits communities with substantial farm worker activity to meet with workers, local agencies, and employers, to assess their needs and determine the effectiveness of the CareerForce services. Also, promoting to employers the labor exchange system services website which contains information of particular importance to agricultural and non-ag employers. Agricultural and non-agricultural employers in the area are provided information on:

- The Agricultural Recruiting System (ARS)
- Posting their ~~job orders~~ [clearance orders](#), Job Fairs, Apprenticeship programs
- Federal and state employment compliance regulations
- The availability of presentations by compliance agencies to growers' associations, and other affected groups and organizations
- Field and quality assessments
- Mediation/interpreter services
- Liaison between migrant service providers and employer

Minnesota is working to improve outreach to agricultural employers by better marketing the ARS to all agricultural employers to ensure Minnesota meets the DOL regulatory requirements. Moving forward, the Agricultural Outreach Representatives and the SMA will seek new opportunities and best practices to market the ARS. Effective marketing for all CareerForce services including ARS will be accomplished through continued relationship building with the agricultural community via in-person contacts, local office recruitment activities, networking events, job fairs, and community engagement events. New outreach materials are ~~also being reviewed and continually being~~ developed [as needed](#) to provide information on compliance assistance, worker protections, labor laws, and other services available to agricultural employers and job seekers. In addition, Minnesota is in the process of upgrading our labor exchange to one that will have greater technical capacity to serve agricultural workers and employers with improved features and significant enhancements to the ARS.

Minnesota is involved in a multi-state effort to ensure agricultural jobs are marketed to American workers prior to submitting applications for H2A workers.

-Finally, Minnesota’s Governor has created a Governor’s Committee on the Health, Safety, and Wellbeing of Agricultural and Food Processing Workers. The Committee ~~is Co-Chaired~~ byincludes DEED leadership and consists of representatives from multiple State Departments as well stakeholders from across the spectrum – both agricultural employer groups as well as worker advocacy organizations. This Committee presents a great forum to ensure that connections and relationships are strengthened to improve the ~~well-being~~well-being of agricultural and food processing workers while strengthening connections to agricultural employers.

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS

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The SMA and AORs hold informational meetings throughout the peak-season at the camps to provide information relevant to the MSFWs such as the Employment Service Complaint Process, referrals to the Unemployment Insurance Program and the full range of employment services available at the local one-stop centers. The meeting notice is posted in advance, farm workers are contacted by phone and via text messaging, partner agencies are made aware of outreach events so that they may promote the event with other agencies or workers, and the outreach events are held usually in the afternoons to accommodate MSFWs’ shift work schedules. Other MSFW service provider agencies attend and present regarding agency service eligibility, type of services and benefits available. The meetings are well attended by the workers and their families and provide the outreach workers an opportunity to exchange agency contact information with other agency staff.

-Collaborative outreach events will oftentimes include enforcement agencies who can review specific laws and regulations and address legal concerns from farm workers. When conducting outreach to farm workers the AORs will review the complaint process with each farm worker and provide business cards for other enforcement agency contacts to assist farm workers in obtaining legal action, when needed.

-The AORs play a significant role in assisting MSFWs with the Employment Service Complaint Process and referral to the Unemployment Insurance Program-. Farm workers may be unfamiliar with timeframes for filing, the appeals process or deadlines for applications. Scholarly research have found that many of the agricultural workers have limited English language skills and limited educational attainment or less than high school education. Furthermore, MSFWs’ wages earned in Minnesota are for the most part their total yearly earnings. AORs identify LEP community members in the registration process and inform them of their options for assistance including Language Line availability as well as translator assistance.

The complaint system is administered by a designated representative (not the SMA) to assure no conflict of interest. Discrimination complaints are then referred to the state-level EO officer.

C. C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

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Page 197 Outreach staff contact agricultural and non-agricultural employers, providing them with information about the employment services available for employers such as posting jobs,

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viewing resumes, hiring priority targeted populations, apprentice programs, WOTC, tax credit program and local Job Fairs. We distribute informational pamphlets on the MSFW program and resources (bilingual) directed to Agricultural and non-agricultural employers that include contact information for the local one-stop offices. The SMA visits communities with substantial farm worker activity to meet with workers, local agencies and employers, to assess their needs and determine the effectiveness of the CareerForce services. Also, promoting to employers is the labor exchange system services website which contains information of particular importance to agricultural and non-ag employers. Minnesota's online labor exchange system is called MinnesotaWorks.net ~~but is transitioning to CareerForce.mn.gov.~~

The Agricultural Recruitment System (ARS) is promoted to employers through in-person contact during outreach to employers or at the local AJC. An informational sheet is provided to employers which lists the services provided and the requirements for participating in ARS. An employer brochure titled, "Get Help Hiring Farm Workers", is also distributed to employers during outreach. Both the ARS informational sheet and the brochure are available in the local AJC for walk-in customers who may be employers.

Farm workers also receive information on the ARS which explains how ARS functions. Contact information for the AORs and the SMA is listed on the informational sheet. The AORs promote the ARS to both the employers and the farm workers.

Employers create an employer account in ~~MinnesotaWorks.net~~ [CareerForce.mn.gov](https://www.careerforce.mn.gov), our online self-service labor exchange system, and once approved, they may enter job postings. Employers in search of workers may also contact the local offices staff for assistance in searching for candidates who match the employers' job categories and other requirements of the positions. In addition, the outreach staff is acquainted with employers in their prospective areas who repeatedly hire seasonal workers. Agricultural and non-agricultural employers in the area are provided information on:

- The Agricultural Recruitment System (ARS)
- Posting ~~job orders~~ [clearance orders](#), Job Fairs, industry events, work-based learning opportunities including apprenticeships and other training programs
- Federal and state employment compliance regulations
- The availability of presentations by compliance agencies to growers' associations, and other related groups and organizations
- Field and quality assessments
- Mediation/interpreter services

Liaison between migrant service providers and employers The ARS will be upgraded when Minnesota's aging MinnesotaWorks.net system is replaced with a new compliant labor exchange. ~~The request for proposal process that selected the new vendor included information sufficient to ensure the new system is capable of performing the required activities of the ARS.~~

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

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THE NEXT FOUR YEARS (INCLUDING ANY APPROXIMATE TIMELINES FOR ESTABLISHING AGREEMENTS OR BUILDING UPON EXISTING AGREEMENTS).

-The SMA and AORs hold informational meetings throughout the ~~high~~-peak season at the camps to provide information relevant to the MSFWs. Other MSFW service provider agencies attend and present information regarding agency service eligibility, type of services and benefits available. The meetings are well attended by the workers and their families and provide the outreach workers an opportunity to exchange agency contact information with other agency staff.

-The AORs continue to contact farm workers at their work sites, living areas and gathering places. The AORs collaborate with advocacy groups including County Social Service agencies, Migrant Education centers, [Community Health Service, Inc.](#) ~~Health Service centers~~, local community agencies, Migrant Head Start, The Agricultural Worker Project of SMRLS and other service providers to enable them to provide outreach and locate farm workers that are missed through CareerForce outreach efforts. The cooperative referral arrangements with these agencies are based on long-standing agreements.

-The outreach staff in the four significant local offices develop a yearly outreach plan which, in part, describes the coordination and referral system with other local community MSFW service providers and partners. This includes setting goals and objectives on employer and worker contacts, registration number of workers, job referrals and ~~following up~~[following up](#) on referrals to record results, increasing the number of employer visits and making contacts for job development and making assessments of the needs of farm workers and employers. These plans are monitored by the State Monitor Advocate (SMA) as part of the office review process to ensure that MSFWs and employers have full access to all CareerForce services.

-The State Monitor Advocate and the AORs maintain close contact with the following organizations in the interest of providing effective and inclusive delivery of service to their customers:

- The Agricultural Worker Project of SMRLS
- Motivation Education and Training Inc. (MET)
- Community Health Services, Inc.
- Tri-Valley Opportunity Council, Inc. (TVOC)

Minnesota has a Memorandum of Understanding in place with Motivation, Employment and Training (NFJP grantee) that was renewed in 2023. Our collaboration with Southern Minnesota Regional Legal Service, [Community Health Service, Inc.](#) ~~Migrant Community Health Services Inc.~~ and Tri-Valley Opportunity Council are not formalized as written agreements but are long term relationships. We will seek to formalize our partnership with these organizations over the next two years.

B. REVIEW AND PUBLIC COMMENT

-IN DEVELOPING THE AOP, THE SWA MUST SOLICIT INFORMATION AND SUGGESTIONS FROM NFJP GRANTEEES, 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 GRANTEEES, PUBLIC AGENCIES, AGRICULTURAL EMPLOYER

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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.

Page 199 The ~~aop~~ AOP was posted on <https://mn.gov/deed/gwdb/priorities/wioa/> and sent out to stakeholders by the director of the ~~gwdb~~ GWDB and made available for public comment. The ~~aop~~ AOP was made available via email notification to the following ~~msfw~~ MSFW groups: ~~nfjp~~ NEJP grantee, ~~M~~motivation ~~E~~education and ~~T~~training, ~~I~~nc., (met), ~~T~~ri-~~V~~alley ~~O~~ppportunity ~~C~~ouncil, ~~I~~nc. (~~tvoc~~ TVOC), ~~minnesota~~ Minnesota ~~D~~epartment of ~~A~~griculture, the ~~A~~gricultural ~~W~~orker ~~P~~roject of ~~smrls~~ SMRLS and all state agencies in ~~minnesota~~ Minnesota.

Comments were received from SMRLS AWP, which are as follows:

Dear Lidibette Guzman and DEED leadership, On behalf of the Agricultural Worker Project (AWP) of Southern Minnesota Regional Legal Services (SMRLS), we offer comments about the “Minnesota Combined State Plan 2024-2027: Plan Draft for Public Comment” and its impact upon our clients. In making these comments, we are focused on the Wagner-Peyser Act Section, specifically the Agricultural Outreach Plan (AOP). Thank you for the opportunity to provide feedback. SMRLS is a non-profit law firm which receives federal, state, local, public and private funding to provide free legal aid to low income and elderly people who reside in 33 counties of southern Minnesota. Additionally, SMRLS’ AWP provides free and confidential civil legal aid to eligible agricultural workers in all counties of Minnesota and North Dakota. The AWP team focuses on improving the working and living conditions of agricultural workers through legal representation, outreach, and education. The AWP advises and represents clients with cases involving wage theft, workplace health and safety violations, inadequate employer-provided housing, labor trafficking, employment discrimination or retaliation, H-2A contract violations, and other legal matters that specifically impact agricultural workers. The AWP provides legal rights education to agricultural workers in Minnesota and North Dakota through extensive outreach programming. Assessment of Unique Needs for Farmworkers [20 CFR 653.107(d)(2)(i)] The AOP identifies the Migrant Indicators of Compliance as the standard that DEED would like to meet for services provided to MSFWs. What constitutes these Migrant Indicators of Compliance? The AOP cites the 2017 Census of Agriculture in response to providing an assessment of the state’s agricultural activity. Results from the 2022 Census of Agriculture became available on February 13, 2024. We request that the AOP include updated information from the 2022 Census of Agriculture so that the assessment is the most accurate and timely, especially because this AOP will apply through PY27. The AOP states “the majority of the agricultural employers in Minnesota include:” then proceeds to list larger corporations that employ agricultural and food processing (cannery) workers. We believe that it would be more accurate to state, “Some of the largest agricultural employers include:” The AOP refers to the newer hemp farming industry. It states that Minnesota expects an increased need of

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farmworker laborers. We request that the AOP include updated information as to the status of the hemp farming industry including but not limited to the size of the farmworker labor force and the geographical locations where most hemp farming occurs. Assessment of Agricultural Activity in the State The AOP states Minnesota is “second only to California in wild rice production.” We request that the AOP include more information as to the status of wild rice production, including but not limited to the size of the farmworker labor force and the geographical locations where most production occurs. We also seek clarification regarding the statement that “the farmworkers working in Minnesota are primarily employed by food processing companies.” Does this statement include all types of food processing, including “canning, packing, and otherwise processing poultry or meat for consumption” (Minnesota statute section 181.635, subdivision 1, paragraph (d))? It appears that the AOP seems to be referring to agricultural workers/companies and food processing workers/companies incorrectly (i.e. interchangeably). Please clarify. Assessment of the Unique Needs of MSFW Farmworkers: Characteristics The AOP estimates approximately 5,000-6,000 migrant farmworkers in Minnesota. The AWP requests more information on how DEED arrives at that number. Furthermore, the AWP requests that the AOP describe potential barriers to accurately counting the number of migrant farmworkers. It is vital that DEED endeavor to provide a good faith estimate of the number of MSFWs in MN in a given year in order to adhere to 88 FR 82658 by January 22, 2026. How else will DEED be able to determine if it contacted “the majority of MSFWs” in Minnesota in a given year (20 CFR 653.107(a)(4))? This section states that “Minnesota has experienced the recent closing of two food processing plants...” However, these closures occurred over four years ago: Seneca Foods closed its Rochester plant in Fall 2018 and Del Monte’s Sleepy Eye location was shuttered in Summer 2019. These closures are, therefore, not recent; please omit “recent.” Please clarify how MSFWs continue to be impacted by these closures several years later and how those impacted workers will be assisted by DEED’s Agricultural Outreach Representatives (AORs) and other DEED staff. Outreach Activities [20 CFR 653.107(d)(2)(iii)] Four paragraphs are listed twice (aka are duplicative) between the section “4) Outreach Activities” and “4)A) Contacting farmworkers who are not being reached...” Was this done intentionally for emphasis or should the duplicative information be removed? The AOP states there are only four CareerForce locations that have a significant amount of MSFW activity. Please provide the source of this information and please list the four specific locations. AWP staff often speak with MSFWs after the employment relationship has broken down, either by the worker resigning or the employer terminating the worker. When a worker becomes a client of the AWP, AWP attorneys can advise and represent them for reasons such as illegal termination and unpaid wages. The AWP is also aware that workers sometimes experience bad workplace relationships with employers or other representatives of an agricultural business. Sometimes the conduct of an employer or business representative does not rise to the level of illegality but is instead caused by personality differences or miscommunication about workers’ needs. The AWP requests the AOP report on efforts to mediate between MSFWs and agricultural employers, business representatives, and/or management to avoid a breakdown of the employment relationship. This would hopefully provide remedies to workers who seek a better work environment and to those whose situation otherwise does not have a legal remedy. Coordination with NFJP Grantees This section states that “Minnesota has a Memorandum of Understanding [MOU] with Motivation, Education and Training, Inc. (MET)...” It seems unlikely that the entire state of Minnesota or its executive, legislative, or judicial branch has such a legal affiliation with MET. Please clarify which specific agency (DEED?) has an MOU with MET. Services to Agricultural Employers The Minnesota Governor’s Committee on Safety, Health, and Wellbeing of Agricultural and Food Processing

Workers (AWWC) was established by Executive Order on March 19, 2021. Please correct the cited name of the AWWC, as it is incorrectly listed in the AOP. The AOP also misconstrues the purpose of the AWWC, only stating that the Committee helps “improve services to agricultural employers.” A review of the Executive Order, along with the AWWC’s December 2021 Recommendations to Governor Walz, clearly reveals that another principal purpose of the AWWC is to improve the wellbeing of agricultural and food processing workers. DEED would be remiss to not address the other goals of the Committee – especially since DEED serves employers, employees, and jobseekers. Pursuant to 20 C.F.R. § 653.501(c)(3)(vi), as a prerequisite to placing a job order into intrastate or interstate clearance, the SWA must obtain an assurance from the employer of “the availability of no cost or public housing which meets the Federal standards...”. Once this assurance is obtained, the SWA “must determine, through a preoccupancy inspection performed by ES staff or an appropriate public agency, that the housing assured by the employer is either available and meets the applicable housing standards or has been approved for conditional access to the clearance system...” (20 C.F.R. § 653.501(b)(3)). While the Wagner-Peyser regulations relating to processing of clearance orders (20 C.F.R. § 653.501, et seq.) do not themselves define “federal standards,” another section of the Wagner-Peyser regulations (20 C.F.R. § 654.400, et seq.) does. 20 C.F.R. § 654.400(a) states that “...it is the policy of the Federal-State ES system to deny its intrastate and interstate recruitment services to employers until the State ES agency has ascertained that the employer’s housing meets certain standards.” 20 C.F.R. § 654.400(b) goes on to explain that “to implement this policy, § 653.501 of this chapter [the clearance order processing regulation section] provides that recruitment services must be denied unless the employer has signed an assurance that if the workers are to be housed, a preoccupancy inspection has been conducted, and the ES staff has ascertained that, with respect to intrastate or interstate clearance orders, the employer’s housing meets the full set of standards set forth at 29 C.F.R. 1910.142 or this subpart [the OSHA labor camp standards] ...” Accordingly, DEED cannot lawfully place a job order into the intrastate clearance system (like the ARS) or the interstate clearance system (like the SeasonalJobs search engine) unless the housing complies with the OSHA labor camp regulations. How does DEED ensure compliance with these regulations?

[Page 201](#) Professional Development of Outreach Workers It is vital that outreach staff, including DEED’s AORs, be trained to utilize the Complaint System (20 CFR 658.410) and that they indeed use the Complaint System. Pursuant of 20 CFR 653.107(b)(6), “Outreach staff must be alert to observe the working and living conditions of MSFWs and if an outreach staff member observes or receives information about apparent violations, the outreach staff member must document and refer the information to the appropriate ES Office Manager” (emphasis added). Through data requests to local (Minnesota), state (Minnesota), and federal agencies, the AWP team is aware that agricultural employers and/or others that provide, own, or control housing in Minnesota for migrant agricultural workers are not complying with 29 CFR 500.135 and 29 U.S.C. § 1823(b)(1). In 2023 alone the AWP was made aware of multiple housing facilities for migrant agricultural workers that violated the applicable regulations.ⁱ Much of Minnesota’s other “non-H-2A” agricultural worker housing (i.e. for settled and/or seasonal agricultural workers) is also not inspected annually. Because “non-H-2A” housing is not regularly inspected, DEED’s AOR’s must know how to report bad housing conditions including via the Complaint System. Additionally, as identified on the AWWC’s “Report Housing Complaints” resource, significant gaps exist in the process for submitting housing complaints. In light of these gaps, AORs play a critical role in reporting housing violations as required by 20 CFR 653.107(b)(6). The AWP believes that a close working relationship with the AORs and SMA as an asset to accessing MSFW housing to report violations and seek remedies. Marketing the

Complaint System What are examples of when MSFWs have received training regarding the Complaint System? How many workers received this training during the current/previous AOP? Where were the trainings administered? The AWP requests to receive an annual training about the Complaint System. Marketing the Agricultural Recruitment System (ARS) How many Minnesota employers use the ARS to recruit U.S. workers for agricultural jobs? How many U.S. workers have been hired because of an agricultural employer used the ARS? How does DEED plan to proactively and effectively promote the ARS to U.S. workers and employers? We are aware that the three-tiered ARS is not working the way that it is supposed to. Recruitment for Minnesota-based agricultural jobs – including H-2A jobs – is bypassing the local and/or statewide level and is not occurring in other states or territories via the ARS. When H-2A jobs are immediately posted to the USDOL SeasonalJobs search engine, there is no way for DEED nor any other agency to control who sees the job posting. Unfortunately, a non-U.S. worker may learn about the job before a U.S. worker. The U.S. worker might never learn about the job. The flaws of ARS in the age of the internet threaten the agricultural employment opportunities of MSFWs and other U.S. workers. General The AOP inconsistently and/or inaccurately references our program and another MSFW-serving program. We request that all references to “Migrant Legal Services,” “Southern Minnesota Regional Legal Services,” “the Agricultural Workers Project,” “AWP,” “Southern Minnesota Rural Legal Services/Agricultural Worker’s Program (SMRLS/AWP),” etc. use the consistent format of “the Agricultural Worker Project of Southern Minnesota Regional Legal Services (SMRLS)” (first reference) and “the Agricultural Worker Project of SMRLS” (subsequent references). There is an incorrect reference “Migrant-Community Health Services, Inc.” This needs to be changed to “Community Health Service, Inc.” The name is correctly listed in the list of AOP recipients. Review and Public Comment DEED failed to comply with 20 CFR 653.107(d)(3); it did not provide “WIOA sec. 167 National Farmworker Jobs Program (NFJP) grantees [i.e. MET], other appropriate MSFW groups [like the AORs], public agencies, agricultural employer organizations, and other interested organizations [like the AWP and Tri-Valley Opportunity Council] “at least 30 calendar days for review and comment” of the AOP. The AOP was e-mailed to these agencies and individuals by the SMA on January 22, 2024, only 25 calendar days before the February 16, 2024 deadline. This is a significant oversight on the part of DEED leadership. DEED also appears to have excluded Community Health Services, Inc. from the opportunity to review and comment even though the organization is listed in the AOP as a recipient of the report. This is also the first time that the AWP has been invited to comment on the AOP. However, the AWP has been and continues to be a vital partner of DEED’s MSFW staff and, therefore, requests to be provided the opportunity to review and comment on future AOPs with at least the required 30-day timeframe. Please send future invitations to comment to awp@smrls.org The AOP also states that no comments were received from the listed advocacy groups. That statement is false due to the submission of this comment and any other comments received by the SWA. Pursuant of 20 CFR 653.107(d)(3)(iii), the SWA must “transmit the comments and recommendations received and its responses to the Department with the submission of the AOP.” State Monitor Advocate The AWP believes that DEED, as the MN SWA, does not comply with 20 CFR Part 658 Subpart F and 20 CFR Part 653 regarding Discontinuation of Services to Employers by the Wagner-Peyser Act. Our team has witnessed that DEED staff are not familiar with the discontinuation process. The Wagner-Peyser Assurance 4.1-7 of the AOP is, therefore, believed to be false. How will DEED ensure that SWA officials – including the Minnesota SMA and AORs – know how to identify violations under 20 CFR 658.501, 20 CFR 653.501(c)(4), and 20 CFR 653.503(d)? How will SWA officials be equipped and held accountable to discontinue services under 20 CFR Part 658 Subpart F? It is a disservice to all Minnesota’s workers – including MSFWs – and Minnesota

employers when these regulations are not upheld. Closing In conclusion, activities under the Wagner-Peyser Act profoundly impact Minnesota's MSFWs and their ability to obtain and maintain agricultural employment and protect their rights. The AWP is committed to serving Minnesota's agricultural workers – including MSFWs – and we appreciate the opportunity provide comments on the AOP as part of the "Minnesota Combined State Plan 2024-2027: Plan Draft for Public Comment." We hope these comments will be considered as part of continuous efforts to improve the performance of these programs and their service to Minnesota's migrant and seasonal farmworkers. We expectantly await a written response about whether our comments have been incorporated and, if not, the reasons thereof (20 CFR 653.107(d)(3)(ii)) and request this response within 5 calendar days that the final AOP is submitted to DEED. Please submit the written response to awp@smrls.org.

Sincerely, Elise Sporre, M.A.
AWP Project Manager & Outreach Coordinator
elise.sporre@smrls.org 651-894-6854 (direct)
-Griselt Andrade, J.D. AWP
-Lead Attorney griselt.andrade@smrls.org

SWA Agency Response to Comments:

-March 27, 2024

To: Elise Spore, AWP Project Manager and Outreach Coordinator
Griselt Andrade, AWP Lead Attorney Re: DEED WIOA State Plan Response on comments specific to the Agricultural Outreach Plan (AOP)

From: Jeanna Fortney, CareerForce Director
Reggie Worlds, Job Service Senior Operations Director

-Dear Elise Spore and Griselt Andrade, We thank both of you, and your organization, for your feedback to our WIOA State Plan. Your comments provided us with opportunities to improve and address some areas for content improvement of our Agricultural Outreach Plan. Several of your comments were reviewed and appropriate changes were made to reflect comments in the areas of:

- Assessment of Agricultural Activity in the State
- Assessment of the unique needs of MSFW Farmworkers Characteristics
- Outreach Activities • Coordination with NFJP Grantees
- Services to Agricultural Employers

~~Page 203~~ There are additional comments that will be addressed for further consideration and implementation in the 2026 AOP update. These comments include prerequisites to placing job orders, marketing the Agricultural Recruitment System (ARS), Marketing the Complaint system and Discontinuation of Services to Employers by the Wagner-Peyser Act. DEED has noted the delay in providing the AWP with the opportunity to review and comment on the AOP within the prescribed 30-day time frame. We pledge to ensure to meet this requirement when future plans are submitted. We again thank you for your comments and thorough review of the Agricultural Outreach Plan. Sincerely, Jeanna Fortney, CareerForce Director Minnesota Department of Employment and Economic Development CC: Reggie Worlds, Field Operations Regional Manager

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C. DATA ASSESSMENT

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-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.

In PY 21 and 22, Minnesota met all 8 Equity Ratio Indicators. and met 2 of the 5 in PY 20. The loss of our SMA in 2021 contributed to decreased performance in the Equity Indicators. Continued training for outreach workers to ensure that all data is accurately recorded will also assist our state to comply in this area.

State Workforce Agencies (SWAs) must provide MSFWS the full range of career services of the workforce development system on a basis which is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWS (TEGL 20-16). SWAs must meet the equity indicators which include: 1) Referral to Jobs, 2) Received Staff Assisted Services, 3) Referred to Support Services, 4) Career Guidance, and 5) Job Development Contact. Four of the five equity indicators must be met. To meet the equity performance standards the percentage of services provided to MSFWS must be equal to or ~~great~~^{greater} than the percentage of services offered to non-MSFWS. For example, if there are 100 non-MSFWS and 50 MSFWS registered for services in the local ES office, and 50 of the non-MSFW participants are referred to employment, the local office must refer at least 25 (50%) of the MSFWS for that office to meet this equity ratio indicator (TEGL 20-16).

-Underreporting of MSFW Service Recipients

-The underreporting of MSFW participants identified by the Regional Monitor Advocate in 2023 was caused by Minnesota failing to identify Migrant and Seasonal Farmworker (MSFW) service recipients as also receiving Wagner-Peyser Employment Services in our Title III Wagner-Peyser Participant Individual Record Layout (PIRL) file. This issue was corrected for Minnesota's Program Year 2023 reporting.

-By retroactively setting PIRL data element 918 (Wagner-Peyser Employment Service WIOA) to '1 = Yes, Participant' for records where PIRL data element 413 (Migrant and Seasonal Farmworker Designation) is equal to '1 = Seasonal Farmworker,' or '2 = Migrant,' in our archived PIRL files, Minnesota can generate revised data for Program Years 2020 through 2022. With that retroactive correction applied, Minnesota's count of MSFW participants served by program year are as follows:

- Program Year 2021~~0~~ (07/01/2021~~0~~ – 06/30/2022~~4~~): ~~293479~~
- Program Year 2022~~4~~ (07/01/2022~~4~~ – 06/30/2023~~2~~): ~~360386~~
- Program Year 2023~~2~~ (07/01/2023~~2~~ – 06/30/2024~~3~~): ~~400395~~
- Program Year 2024 (07/01/2024 – 06/30/2025): 257

-Equity Ratio Indicators

-Attachment 5 of Training and Employment Guidance Letter (TEGL) 14-18 states that all State Workforce Agencies must provide MSFWS the full range of services of the workforce

development system on a basis which is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs.

-To monitor compliance with this guidance, the United States Department of Labor (USDOL) created eight Equity Ratio Indicators (ERIs) for states to report. To pass an ERI metric, the percentage of services provided to MSFWs must be equal to or greater than the percentage of services offered to non-MSFWs.

Table 1, Table 2, and Table 3 below provide Minnesota's retroactively corrected ERI results for Program Years 2020, 2021, and 2022. As the tables demonstrate, Minnesota has consistently passed all the ERI metrics since 2020. Our sole failure occurred in Program Year 2020 on the 'Referred to Employment' metric, where the percentage of MSFWs receiving that service was 0.3 percent below the percentage for non-MSFWs.

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ALL OF THIS INFORMATION BELOW IN YELLOW IS IN A TABLE STARTING ON PAGE 204

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ERI Metric	MSFW	MSFW Percentage	non-MSFW	non-MSFW Percentage	ERI Outcome
Total Applicants	299		15,936		
Received Staff Assisted Services	299	100.0%	15,936	100.0%	Pass
Career Guidance Services	196	65.6%	5,591	35.1%	Pass
Job Search Activities	299	100.0%	11,749	73.7%	Pass
	6	2.0%	374	2.3%	Fail
Received UI Claim Assistance	42	14.0%	978	6.1%	Pass
Referred to Federal Training	221	73.9%	4,064	25.5%	Pass
Referred to Other Fed/State Assistance	228	76.3%	5,909	37.1%	Pass
Received Individual Career Service	299	100.0%	0	0.0%	Pass

<u>ERI Metric</u>	<u>MSFW</u>	<u>MSFW Percentage</u>	<u>non-MSFW</u>	<u>non-MSFW Percentage</u>	<u>ERI Outcome</u>
<u>Total Applicants</u>	<u>360</u>		<u>16,212</u>		
<u>Received Staff Assisted Services</u>	<u>360</u>	<u>100.0%</u>	<u>16,212</u>	<u>100.0%</u>	<u>Pass</u>
<u>Career Guidance Services</u>	<u>283</u>	<u>78.6%</u>	<u>3,140</u>	<u>19.4%</u>	<u>Pass</u>
<u>ERI Metric</u>	<u>MSFW</u>	<u>MSFW Percentage</u>	<u>non-MSFW</u>	<u>non-MSFW Percentage</u>	<u>ERI Outcome</u>
<u>Job Search Activities</u>	<u>360</u>	<u>100.0%</u>	<u>12,372</u>	<u>76.3%</u>	<u>Pass</u>
<u>Referred to Employment</u>	<u>6</u>	<u>1.7%</u>	<u>128</u>	<u>0.8%</u>	<u>Pass</u>
<u>Received UI Claim Assistance</u>	<u>66</u>	<u>18.3%</u>	<u>886</u>	<u>5.5%</u>	<u>Pass</u>
<u>Referred to Federal Training</u>	<u>268</u>	<u>74.4%</u>	<u>5,619</u>	<u>34.7%</u>	<u>Pass</u>
<u>Referred to Other Fed/State Assistance</u>	<u>280</u>	<u>77.8%</u>	<u>7,185</u>	<u>44.3%</u>	<u>Pass</u>
<u>Received Individual Career Service</u>	<u>360</u>	<u>100.0%</u>	<u>0</u>	<u>0.0%</u>	<u>Pass</u>

<u>ERI Metric</u>	<u>MSFW</u>	<u>MSFW Percentage</u>	<u>non-MSFW</u>	<u>non-MSFW Percentage</u>	<u>ERI Outcome</u>
<u>Total Applicants</u>	<u>400</u>		<u>15,969</u>		
<u>Received Staff Assisted Services</u>	<u>400</u>	<u>100.0%</u>	<u>15,969</u>	<u>100.0%</u>	<u>Pass</u>
<u>Career Guidance Services</u>	<u>314</u>	<u>78.5%</u>	<u>2,654</u>	<u>16.6%</u>	<u>Pass</u>

<u>Job Search Activities</u>	<u>400</u>	<u>100.0%</u>	<u>12,409</u>	<u>77.7%</u>	<u>Pass</u>
<u>Referred to Employment</u>	<u>8</u>	<u>2.0%</u>	<u>67</u>	<u>0.4%</u>	<u>Pass</u>
<u>Received UI Claim Assistance</u>	<u>134</u>	<u>33.5%</u>	<u>898</u>	<u>5.6%</u>	<u>Pass</u>
<u>Referred to Federal Training</u>	<u>294</u>	<u>73.5%</u>	<u>6,996</u>	<u>43.8%</u>	<u>Pass</u>
<u>Referred to Other Fed/State Assistance</u>	<u>314</u>	<u>78.5%</u>	<u>7,210</u>	<u>45.1%</u>	<u>Pass</u>
<u>Received Individual Career Service</u>	<u>400</u>	<u>100.0%</u>	<u>0</u>	<u>0.0%</u>	<u>Pass</u>

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ERI Metric MSFW MSFW Percentage non-MSFW non-MSFW Percentage ERI Outcome Total Applicants 299 15,936 Received Staff Assisted Services 299 100.0% 15,936 100.0% Pass Career Guidance Services 196 65.6% 5,591 35.1% Pass Job Search Activities 299 100.0% 11,749 73.7% Pass 6 2.0% 374 2.3% Fail Received UI Claim Assistance 42 14.0% 978 6.1% Pass Referred to Federal Training 221 73.9% 4,064 25.5% Pass Referred to Other Fed/State Assistance 228 76.3% 5,909 37.1% Pass Received Individual Career Service 299 100.0% 0 0.0% Pass ERI Metric MSFW MSFW Percentage non-MSFW non-MSFW Percentage ERI Outcome Total Applicants 360 16,212 Received Staff Assisted Services 360 100.0% 16,212 100.0% Pass Career Guidance Services 283 78.6% 3,140 19.4% Pass Page 205 ERI Metric MSFW MSFW Percentage non-MSFW non-MSFW Percentage ERI Outcome Job Search Activities 360 100.0% 12,372 76.3% Pass Referred to Employment 6 1.7% 128 0.8% Pass Received UI Claim Assistance 66 18.3% 886 5.5% Pass Referred to Federal Training 268 74.4% 5,619 34.7% Pass Referred to Other Fed/State Assistance 280 77.8% 7,185 44.3% Pass Received Individual Career Service 360 100.0% 0 0.0% Pass ERI Metric MSFW MSFW Percentage non-MSFW non-MSFW Percentage ERI Outcome Total Applicants 400 15,969 Received Staff Assisted Services 400 100.0% 15,969 100.0% Pass Career Guidance Services 314 78.5% 2,654 16.6% Pass Job Search Activities 400 100.0% 12,409 77.7% Pass Referred to Employment 8 2.0% 67 0.4% Pass Received UI Claim Assistance 134 33.5% 898 5.6% Pass Referred to Federal Training 294 73.5% 6,996 43.8% Pass Referred to Other Fed/State Assistance 314 78.5% 7,210 45.1% Pass Received Individual Career Service 400 100.0% 0 0.0% Pass

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

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believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Minnesota has addressed the data discrepancies from the previous reporting period of performance, which contributed to the under-reporting of participants and services rendered to migrant farm workers. We renewed the memorandum of understanding with MET, the Minnesota NFJP grantee and have strengthened relationships with other important partners. This includes the Minnesota Department of Labor Industry who recently conducted trainings on labor trafficking, child labor, health and safety, which CareerForce staff were included in. The SMA is also working on a relationship with the Minnesota Department of Education (MDE) and their migrant education program.

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AOR's engaged in several training sessions with our WIOA, TANF, State and Community partners to increase staff knowledge of resources to refer migrant farm workers to for additional educational, training and support services. We increased interactions between the AOR's and the Foreign Labor Certification staff for cross training and to better support each service area. We initiated a new centralized complaint system that will allow for easier reporting of MSFW complaints by AOR's and tracking by the SMA. The loss of our incumbent MSFW/FLC supervisor stalled progress in some areas to include better promotion of the Agricultural Recruitment System (ARS) to Minnesota employers and farmworkers. The new incumbent will pick up this work along with increasing the promotion of H2-A opportunities to Migrant Farmworkers and will take a new look at how we are conducting outreach across the state. Ongoing training, policy development, and interactions with collateral partners will allow for process improvement, increased MSFW registrations, enrollments, referrals to ESL/GED classes, training opportunities and job placements. The succeeding Supervisor and SMA will work ~~as a~~ cohesively to ensure performance and compliance are aligned and maintained in respective areas of responsibility.

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The CareerForce Division is currently translating more documents into Spanish to enhance tools for outreach. We are at the beginning stages of establishing stronger relationships with Texas, who is our primary MSFW supply state, to ensure services are provided adequately both there and here. Minnesota is also working to build a new labor exchange system to replace MinnesotaWorks.net, to launch in 2026~~5~~. The new labor exchange will be a ~~much improved~~ ~~much-improved~~ site for staff, jobseekers, and employers. It will be a mobile-friendly site that can be easily accessed via cell phone.

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E. ~~F~~-STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

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The state monitor advocate, Lidibette Guzman, reviewed and approved the AOP.

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WAGNER-PEYSER ASSURANCES

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The State Plan must include assurances that:

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<u>The State Plan must include</u>	<u>Include</u>
<u>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));</u>	<u>Yes</u>
<u>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;</u>	<u>Yes</u>
<u>The State Plan must include</u>	<u>Include</u>
<u>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</u>	<u>Yes</u>
<u>4. SWA officials:</u> <u>1) Initiate the discontinuation of services;</u> <u>2) Make the determination that services need to be discontinued;</u> <u>3) Make the determination to reinstate services after the services have been discontinued;</u> <u>4) Approve corrective action plans;</u> <u>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;</u> <u>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</u> <u>7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its</u>	<u>Yes</u>

request for hearing in writing before the hearing.	
5. The SWA has established and maintains a self appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	Yes

THE FOLLOWING INFORMATION WAS IN A TABLE STARTING ON PAGE 206:

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 (see 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 Page 207 The State Plan must include Include 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 5. The SWA has established and maintains a self appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601). Yes

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
5. The SWA has established and maintains a self-appraisal system for ES operations to determine	Yes

The State Plan must include	Include
success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	60.0%		61.0%	
Employment (Fourth Quarter After Exit)	65.0%		66.0%	
Median Earnings (Second Quarter After Exit)	\$8,100.0		\$8,200.0	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

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)).

The content standards for the Minnesota adult education system comprise three components:

- The federally-developed **College and Career Readiness Standards (CCRS) for Adult Education** (<https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf>), which identify key English Language Arts/Literacy, Math, and Foundational Reading Skills;
- The Minnesota-developed **Academic, Career and Employability Skills (ACES) Transitions Integration Framework (TIF)** (<http://atlasabe.org/professional/transitions>), which identifies key professional or soft skills in the areas of Effective Communication, Learning Strategies, Critical Thinking, Self-Management, Developing a Future Pathway, Navigating Systems; and
- The Minnesota-developed **Northstar Digital Literacy Standards** (available at www.digitalliteracyassessment.org), which identify key basic digital literacy skills needed to perform tasks on computers and online.

The CCRS for Adult Education are drawn from the Common Core State Standards (CCSS) and the Minnesota state-adopted K-12 standards for English Language Arts and Literacy and align with the CCSS. The current Minnesota state-adopted K-12 standards for Mathematics encompass some content that is beyond the scope of the CCSS, but are largely aligned with the CCSS.

As part of Minnesota's federal grant competition and the state reauthorization process, awardees are required to affirm and show that their curriculum, instruction, and assessment

align to these Minnesota adult education content standards and that their staff are trained on the use of the standards.

In order to ensure that all adult education practitioners are knowledgeable about the standards listed above and understand how to use them effectively to guide instruction and programming, the Minnesota adult education system has provided ongoing systematic professional development and other support to grantees including:

- Face-to-face workshops and online trainings;
- Online courses;
- Training modules based on the College and Career Readiness Standards-in-Action training tools and processes;
- Technical assistance to eligible providers focused on standards implementation;
- Support for local Professional Learning Communities (PLCs) focused on standards implementation; and
- Online standards resource libraries.

B. LOCAL ACTIVITIES

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, 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.

ADULT EDUCATION PROVIDER SELECTION AND FUNDING ALLOCATION PROCESS

The Minnesota Department of Education (MDE) is the State's Eligible Agency for Adult Education programs. MDE is responsible for administering funds and providing program/performance oversight to grantees.

The federal Adult Education grant competitions are administered in accordance to 34 CFR 463 subpart C. During grant years 2016–17 and 2021-22, MDE implemented a competitive application process for all federal AEFLA funding, including WIOA Sections 231(adult education) and 225 (corrections education) activities. The grant competitive applications are based on the 13 considerations in Title II of WIOA and included additional state ABE priorities. As a result of that process, 36 providers from throughout Minnesota were selected to receive funding beginning July 1, 2022. Minnesota will conduct a new grant competition during the 2027-28 year in order to identify grantees who will begin receiving federal ABE funds on July 1, 2028 (unless WIOA is reauthorized before then and requires a competition earlier).

Adult education eligible providers approved in 2022 will continue to be eligible to receive AEFLA funding, as long as they adhere to state and federal grant expectations, as measured through annual applications, financial reports, and program performance reports.

TIMELINE

The following steps and timeline were followed in 2017 and 2022; they will be used again for the 2028 WIOA AEFLA competition:

January: MDE publishes and promotes federal AEFLA provider grant application materials

January-February: MDE provides technical assistance to inquiries from eligible providers

February-March: MDE recruits reviewers to score and rate WIOA-aligned federally-funded AEFLA grant applications

March: Due date for federal AEFLA provider grant applications

March: MDE screens applications to determine which providers in each application meet demonstrated effectiveness requirements

March/April: Applications from providers that have demonstrated effectiveness are forwarded to official reviewers and to the appropriate workforce development boards that serve the same area as the proposed application

April-May: Official reviewers score and rate federal AEFLA provider grant applications by region; workforce development boards review and provide feedback on federal AEFLA provider grant applications that fall within their workforce service areas

May-June: MDE decides which applicants will be approved as providers based on reviewer scores and ratings, workforce development board feedback, and application's response to the conditions and criteria in the application materials

June: MDE announces awarded grant applicants that will receive federal AEFLA funding as providers

July 1: Awarded federal AEFLA providers begin grant cycle, programming and funding with technical assistance provided by the MDE Adult Education team

ELIGIBLE PROVIDERS

An eligible local provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals and may include:

- Local education agency;
- Community-based or faith-based organization;
- Volunteer literacy organization;
- Institution of higher education;
- Public or private nonprofit agency;
- Library;
- Public housing authority;
- Nonprofit institution with the ability to provide adult education and literacy services;
- Consortium or coalition of agencies, organizations, institutions, libraries, or authorities described above;
- A partnership between an employer and an entity described above and
- Any other entity that has demonstrated effectiveness in serving eligible individuals.

Demonstrated effectiveness is determined in the grant application Provider Details Worksheet, which is described in the "Review Process" section below.

APPLICATION PROMOTION AND PUBLICATION

In 2017 and in 2022, the grant opportunity was publicized in compliance with federal law, Minnesota statute, and MDE policy in order to ensure that all eligible providers had direct and equitable access to apply and compete for grants. The process was fair and equitable and followed federal AEFLA grant funding requirements and other state and federal grant procedures. MDE published and promoted all grant opportunities on its website. Any eligible entity (described above) was able to submit a proposal. A similar process will be followed in 2028.

ALLOCATIONS

MDE dedicates at least 82.5 percent of the state allocation of federal AEFLA funding to grants to eligible providers. This amount is allocated to grantees based on scope of service (number of prior year contact hours for eligible service), accountability aid, aid to support services to participants with low incidence disabilities, regional aid to help local programs implement AEFLA initiatives, and aid to promote career pathway and integrated education and training programming.

In addition, up to 12.5 percent of the state allocation is dedicated to Leadership supporting activities such as: professional development; volunteer recruitment and training; technology; serving students with disabilities; distance learning and digital literacy; program quality support; assessment training; and career pathway and other transitions-related collaborations.

13 CONSIDERATIONS

MDE used the considerations specified in Section 231(e) of WIOA and listed below as the criteria for selecting and funding eligible providers in 2017 and 2022, which will be used again in future competitions until WIOA is reauthorized and the considerations change. As part of the RFP process, agencies were/will be required to provide narrative detail describing how they will meet each consideration.

1. Needs Assessment: The degree to which the provider is responsive to (A) regional needs as identified in the local plan under Section 108; and (B) serving individuals in the community who are identified in such plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills and who are English language learners.
2. Individuals with Disabilities: The degree to which the provider is able to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.
3. Past Effectiveness: The degree to which the provider demonstrates past effectiveness in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in Section 116, especially with respect to eligible individuals who have low levels of literacy.
4. Alignment with One-stop Partners: The degree to which the eligible provider is responsive to, and demonstrates alignment between, proposed activities and services and the strategy and goals of the local plan under Section 108 as well as the activities and services of the one-stop partners.
5. Intensity, Quality, and Instructional Practices: The degree to which the eligible provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and uses instructional practices that include the essential components of reading instruction.
6. Research Based Educational Practices: The degree to which the eligible provider's activities including reading, writing, speaking, mathematics, and English language acquisition instruction, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice.
7. Effective Use of Technology: The degree to which the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a

manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance.

8. Integrated Education and Training: The degree to which the eligible provider's activities offer learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship.

9. Qualified Staff: The degree to which the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the state, where applicable, and who have access to high quality professional development, including through electronic means.

10. Partnerships and Development of Career Pathways: The degree to which the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce development boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways.

11. Flexible Schedules and Coordination with Support Services: The degree to which the eligible provider's activities offer flexible schedules and coordination with Federal, State, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs information management system that has the capacity to report measurable participant outcomes (consistent with Section 116) and to monitor program performance.

12. Information management system: The expectation will be that the eligible provider will use the State-administered designated MIS for all grant-related data collection and reporting; and

13. English Language Acquisition and Civics Education: The degree to which the eligible provider has a demonstrated need for additional English language acquisition programs and civics education programs.

ADDITIONAL CRITERIA

In addition to the above 13 considerations, the grant applications also required descriptions of applicants:

- Location, service area, the scope of the program, a description of the population to be served, fiscal management procedures, and audit history;
- Capacity to offer programming and evidence of the organization's past effectiveness in providing AEFLA-eligible activities and services;
- Budget, as well as programmatic information regarding statutory requirements;
- Coordination with other service providers to provide wrap-around services to participants (e.g., child care, transportation); and

- A description of how the program will align activities to the Local, Regional, and/or State Plan for WIOA providers and supportive services.

REVIEW PROCESS

During years when we have a competition, MDE screens all applications. This screening includes determining which providers meet the demonstrated effectiveness requirement. Starting in 2022, applicants are required to submit a Provider Details Worksheet for each provider included in the application. This worksheet includes responses used to ~~determine demonstrated~~ effectiveness and asks each provider to share data and any additional information on past effectiveness in serving eligible adults. Applicants can demonstrate effectiveness in the Provider Details Worksheet if it includes any data over the last five years that shows the provider achieved any outcomes with documented measurable skill gains and also one additional outcome with either employment, wage, and/or credential attainment with eligible adults.

- Continuing providers submit data available from the state adult education database (SiD) or any other sources that align with the WIOA indicators.
- New providers submit data on past effectiveness with eligible adults from any available sources on metrics similar to the WIOA indicators.

MDE staff review all the Provider Details Worksheets to determine which applications to send to workforce development boards and reviewers to be evaluated and scored.

Next, proposals are evaluated and scored by teams of reviewers approved by the MDE Grants Office and Adult Education Office. Reviewers score applications based on their responses to each of the 13 considerations of WIOA, the programming proposed and its alignment to the four instructional components, the articulated use of funds, and additional criteria listed above. An MDE staff person is part of each review team and facilitates the group review session, during which scores and evaluation comments are compiled into an official review document.

Workforce development boards evaluate applications for alignment to local needs and plans. Boards also document the strengths, weaknesses, and questions they have for each application. This review document is sent to MDE.

MDE selects applicants for federal AEFLA funding based on scores and feedback from reviewers and the workforce development boards. Applicants selected for federal AEFLA funding are notified in May or June and are eligible to start programming on July 1.

Annually

All approved providers are required to comply with all state and federal regulations, policies and expectations for AEFLA grantees including:

1. Using the state AEFLA database (SiD);
2. Reporting annual performance data; and
3. Additional requirements or reporting upon request by state and local agencies.

Adult Education Programming

The focus of adult education instruction in Minnesota will be the above noted content standards contextualized to enhance readiness for employment, citizenship, postsecondary education and training provided through comprehensive services that meet the diverse educational needs of students.

In accordance with federal regulation, grantees receive adult education funding for the delivery of any of the following adult education and literacy activities:

- adult education;
- literacy;
- workplace adult education and literacy activities;
- family literacy activities;
- English language and acquisition activities;
- integrated English literacy and civics education (IEL/Civics);
- workforce preparation activities; or
- integrated education and training, which

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.

Eligible providers are required to implement such activities in accordance with the following federal definitions:

Adult education means academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment.

Literacy means an individual's ability to read, write, and speak in English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

Workplace adult education and literacy activities means adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.

Family literacy activities means 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 all of the following activities:

- A. Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency.

- B. Interactive literacy activities between parents or family members and their children.
- C. Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children.
- D. An age-appropriate education to prepare children for success in school and life experiences.

Special Rule for Family Literacy

MDE will not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 17 and are enrolled or required to be enrolled in secondary school under State law, except that the agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, MDE will 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.

English language acquisition program means a program of instruction designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language; and that leads to attainment of a secondary school diploma or its recognized equivalent; and transition to postsecondary education and training; or employment.

Integrated English literacy and civics education means education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training.

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

Integrated education and training means 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 educational and career advancement.

All funded programs will be required to offer the above listed kinds of programming concurrently based on the needs of the population served and encouraged to blend as much programming as possible into coordinated occupational training, employment, and academic pathways as possible by addressing all standards (CCRS, ACES, and Northstar) in all program components, contextualizing secondary credential programming and providing “navigation” support.

Funding Expectations

Adult Education providers must adhere to relevant law, regulations, and grant expectations in how it uses federal AEFLA funding. Federal funds may be used to increase the level of other funds that would be available in the absence of federal funds, and, in no case, replace those other funds. Federal funds must not be used for the purpose of supplanting, only for supplementing.

Federal AEFLA funding for providers must prioritize and be primarily used for instructional activities. Providers can spend up to 5 percent of their federal AEFLA grant funding on local administrative costs as defined in WIOA Section 233. Providers can negotiate with MDE a higher local administrative rate as long as it is reasonable.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- 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.

Correctional Institution Programs

MDE awards funds to carry out corrections education and education for other institutionalized individuals within correctional institutions in accordance with the requirements of section 225. Funds for corrections education are competed as part the Federal Adult Education competitive grant process for Section 231 funds. The application asks potential grantees and providers that are applying to offer corrections education activities must describe the proposed specific corrections education activities in the application narrative. Applicants wanting to provide corrections education activities must be approved through the federal adult education grant competition in order to receive funding.

Each grantee that receives funds provided under section 225 to carry out a program for criminal offenders within a correctional institution shall give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

Applicants must describe in their grant application how they give priority to individuals most likely to leave the correctional institution within five years of participation in the program.

Section 225(a) of WIOA states, “from funds made available under Section 222(a)(1) for a fiscal year, each eligible agency shall carry out corrections education or education for other institutionalized individuals. The funds described shall be used to provide: (1) Adult education and literacy services, (2) Special education as determined by the eligible agency, (3) Secondary school credit, and (4) Integrated education and training; (5) Career pathways; (6) Concurrent enrollment; (7) Peer tutoring; and (8) Transition to re-entry initiatives and other post-release services with the goal of reducing recidivism.”

MDE reserves no more than 20 percent of its federal AEFLA grant instructional funds (which are at least 82.5% of the state AEFLA grant) to provide programs for corrections education and education for other institutionalized individuals as described in Section 225 and uses the same application process being used for section 231 funds. A single applicant was approved to provide services to Minnesota’s Department of Corrections system. County corrections facilities as well as other facilities such as state hospitals, rehabilitation centers, and limited retention facilities will be addressed by applicants competing for the service area in which they are located.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

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.

Integrated English Literacy and Civics Education (IELCE)

The Minnesota Department of Education ensures that 243 funds are administered in accordance to 34 CFR 463 subpart C.

The goals of IELCE are to:

(1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency; and

(2) integrate with the local workforce development system and its functions to carry out the activities of the program.

The IELCE grant opportunity allows potential eligible providers to show evidence of their past effectiveness in serving adult English language learners. All applicants must demonstrate past effectiveness by providing performance data on their 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. An eligible provider must also provide information regarding their outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

There are two ways in which an eligible provider may meet the requirements above. An eligible provider that has been funded under title II of the Workforce Innovation and Opportunity Act must provide performance data required under section 116 to demonstrate past effectiveness.

Or, an eligible provider that has not been previously funded under title II of the Workforce Innovation and Opportunity Act must provide performance data to demonstrate its past effectiveness in serving basic skills deficient eligible individuals, including evidence of its success in achieving outcomes listed in paragraph (A1) of this section. (CFR § 463.24)

Minnesota accepts all applications from entities that have shown demonstrated past effectiveness for at least a year within the past five years. For applicants using WIOA performance data they must not be significantly below the state average in all areas.

A concerted effort has been made by the MDE Adult Education Team to identify populations of professionals with degrees and credentials in their native countries. Work will continue with the Office of ~~Refugee Resettlement~~New Americans and the Department of Employment and Economic Development (DEED) to identify individuals in this category.

All IELCE grantees are required to provide all four instructional components as outlined in WIOA including:

1. English Literacy
2. Civics (defined as instructing on the rights and responsibilities of citizenship and civic participation in the U.S.A.)
3. Workforce Preparation (operationalized in Minnesota as the ACES Transitions Integration Framework that identifies key workforce preparation skills in the areas of self-management, developing a future pathway, navigating systems, effective communication, learning strategies, and critical thinking in addition to Northstar Digital Literacy)
4. Work Training

IELCE applicants are expected articulate a plan that outlines how the provider will develop an instructional program that integrates all four essential IELCE instructional components. Once awarded, grantees are eligible for ongoing technical assistance and are required to evaluate the effectiveness of their programming and report on outcomes, lessons learned and best practices.

In addition, grantees are required to provide English instruction contextualized to both civics content and occupational training with the occupational training opportunities comprising both short-term certificate programs as well as more extended career pathways.

Minnesota grantees are required to use curriculum that integrates the approved Minnesota Adult Education content standards:

- College and Career Readiness Standards for Adult Education (CCRS);
- Minnesota's Academic, Career and Employability Standards (ACES) Transitions Integration Framework (TIF); and
- Northstar Digital Literacy Standards.

The grant opportunity is a multi-year (three-year) grant offered through a competitive application process specifically for IELCE (Section 243) grant funds. The next grant opportunity will be offered in ~~2025~~2028. The maximum amount for the grant is \$150,000 and the minimum is \$20,000. In 2028, the maximum IELCE annual grant award will be limited to \$100,000 per grantee so more communities can be served. In the past couple competition cycles, ~~128~~14 applicants have been approved to receive an IELCE award.

The application materials require that applicants:

- Describe the programming they would implement and how it incorporates the four instructional components as described above;
- Describe how the grant funds will be used to fund the described programming; and
- Address the WIOA Title II 13 considerations, in accordance to 34 CFR 463 subpart C.

Eligible providers for IELCE include local education agencies, community-based organizations (including faith-based organizations), volunteer literacy organizations, institutions of higher education, public or private nonprofits, public housing authorities, libraries, consortiums of the above, and a partnership between an employer and an entity described above

A fair and equitable process is followed to allow all eligible entities the opportunity to apply for the IELCE grant. MDE publishes all grant opportunities on its website. IELCE applications are rated and scored by teams of reviewers approved by the MDE Grants Office and Adult Education Office. Each application is also reviewed by the local workforce development board in which they are located and the review is taken into consideration when awarding grants.

The review process for selecting successful applicants includes formally scoring applications on their responses to the programming proposed and its alignment to the four instructional components, and the articulated use of funds. In addition, MDE uses the 13 considerations specified in Section 231(e) of WIOA as the criteria for selecting and funding eligible providers. As part of the RFP process, agencies were/will be required to provide narrative detail describing how they will meet each consideration.

1. Needs Assessment: The degree to which the provider is responsive to (A) regional needs as identified in the local plan under Section 108; and (B) serving individuals in the community who are identified in such plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills and who are English language learners.

2. **Individuals with Disabilities:** The degree to which the provider is able to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.
3. **Past Effectiveness:** The degree to which the provider demonstrates past effectiveness in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in Section 116, especially with respect to eligible individuals who have low levels of literacy.
4. **Alignment with One-stop Partners:** The degree to which the eligible provider is responsive to, and demonstrates alignment between, proposed activities and services and the strategy and goals of the local plan under Section 108 as well as the activities and services of the one-stop partners.
5. **Intensity, Quality, and Instructional Practices:** The degree to which the eligible provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and uses instructional practices that include the essential components of reading instruction.
6. **Research Based Educational Practices:** The degree to which the eligible provider's activities including reading, writing, speaking, mathematics, and English language acquisition instruction, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice.
7. **Effective Use of Technology:** The degree to which the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance.
8. **Integrated Education and Training:** The degree to which the eligible provider's activities offer learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship.
9. **Qualified Staff:** The degree to which the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the state, where applicable, and who have access to high quality professional development, including through electronic means.
10. **Partnerships and Development of Career Pathways:** The degree to which the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce development boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways.
11. **Flexible Schedules and Coordination with Support Services:** The degree to which the eligible provider's activities offer flexible schedules and coordination with Federal, State, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs information management system that has the capacity to report measurable participant outcomes (consistent with Section 116) and to monitor program performance.

12. Information management system: The expectation will be that the eligible provider will use the State-administered designated MIS for all grant-related data collection and reporting; and

13. English Language Acquisition and Civics Education: The degree to which the eligible provider has a demonstrated need for additional English language acquisition programs and civics education programs.

IELCE applicants are also asked to describe how their program comprises a clear pathway to occupational training that incorporates the IET model including: how the civics and literacy instruction relates to and prepares students for successful transition to and participation in the IET component of the pathway.

Applicants are asked to describe how their program collaborates with other entities and aligns to workforce development regional needs including providing:

1. Evidence of alignment to local or regional needs as outlined by local workforce boards and/or partners in the workforce development plans, including how applicant will promote concurrent enrollment with programs in Title I.
2. Indications of alignment between proposed activities and services and the strategy and goals of the local plan under section 108 of the Workforce Innovation and Opportunity Act, as well as the activities and services of the one-stop partners.
3. How IELCE programming is developed in coordination and collaboration with other educational, training, and social service resources in the community. Partner entities could include elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce development boards, one-stop centers, job training programs, social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries.

~~In addition, IELCE applicants are also required to describe how their program comprises a clear pathway to occupational training that incorporates the Integrated Education and Training approach including: how the civics and literacy instruction relates to and prepares students for successful transition to and participation in the IET component of the pathway.~~ IELCE grant applications must also describe how their program aligns with local WIOA plans including preparing participants for living-wage, in-demand occupations identified in the plan and must include English Language programming designed to provide participants the means to developed skills that are contextualized to in-demand occupation. Grant applications that propose more extensive coordination and integration of local workforce services into the IELCE program receive higher scores.

Applicants must address local administrative costs in accordance with WIOA Section 233. They are asked to complete a proposed budget with the application. Instructions include that, "Not more than five percent of a local grant to an eligible provider can be expended to administer a grant or contract under title II. In cases where five percent is too restrictive to allow for administrative activities, the eligible agency may increase the amount that can be spent on local administration. In such cases, the eligible provider must negotiate with the eligible agency to determine an adequate level of funds to be used for non-instructional purposes." Reviewers check to ensure the proposed budget aligns with this guidance. ~~Future eCompetitions will~~ include a description of activities that are considered local administrative costs:

- (a) Planning;
- (b) Administration, including carrying out performance accountability requirements;
- (c) Professional development;
- (d) Providing adult education and literacy services in alignment with local workforce plans, including promoting co-enrollment in programs and activities under title I, as appropriate; and
- (e) Carrying out the one-stop partner responsibilities described in § 678.420, including contributing to the infrastructure costs of the one-stop delivery system.

A state ABE staff member meets monthly with the Local Workforce Development Board (LWDB) staff to ensure the grant activities are promoted and connected to the services provided by other WIOA titles. In addition, ABE representatives to the LWDBs receive ongoing support to integrate ABE programming, including IELCE, with the one-stop partners. Grantees receive considerable technical assistance from the MDE Adult Education Team and will be convened for targeted professional development that emphasizes current best practices.

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

MDE uses funds made available under section 222(a)(2) to enhance the quality of programming in the adult education system. Not more than 12.5 percent of the grant funds made available are used to carry out State leadership activities under section 223.

STATE LEADERSHIP

A. THE ALIGNMENT OF ADULT EDUCATION AND LITERACY ACTIVITIES WITH OTHER CORE PROGRAMS AND ONE-STOP PARTNERS, INCLUDING ELIGIBLE PROVIDERS, INCLUDING THE DEVELOPMENT OF CAREER PATHWAYS TO PROVIDE ACCESS TO EMPLOYMENT AND TRAINING SERVICES FOR INDIVIDUALS IN ADULT EDUCATION AND LITERACY ACTIVITIES.

The Minnesota Department of Education will work collaboratively with other core programs and partner agencies to align and coordinate services for program participants. State-level policy and planning bodies provide an opportunity for Minnesota's Adult Education system and local programs to partner with workforce development, human services, higher education and other key agencies. Leadership funds will be used to build the capacity of grantees to coordinate and align services. Specific areas of capacity building include intake/orientation, eligibility screening, and referral between partners, and other joint mechanisms developed through agency partnerships. In addition, the development of all components of career pathways will continue to be a priority with a focus on integrated education and training.

B. THE ESTABLISHMENT AND OPERATION OF HIGH QUALITY PROFESSIONAL DEVELOPMENT PROGRAMS TO IMPROVE THE INSTRUCTION PROVIDED PURSUANT TO REQUIRED LOCAL ACTIVITIES, INCLUDING INSTRUCTION INCORPORATING THE ESSENTIAL COMPONENTS OF READING INSTRUCTION AS SUCH COMPONENTS RELATE TO

ADULTS, INSTRUCTION RELATED TO THE SPECIFIC NEEDS OF ADULT LEARNERS, INSTRUCTION PROVIDED BY VOLUNTEERS OR BY PERSONNEL, AND DISSEMINATION OF INFORMATION ABOUT MODELS AND PROMISING PRACTICES RELATED TO SUCH PROGRAMS.

Minnesota supports a statewide adult education professional development (PD) advisory committee that meets quarterly to identify key present and future PD needs, develop PD plans and resources, identify and implement best practices in PD, and coordinate and align PD activities for an efficient and effective PD system. This advisory committee has approximately 25 members, and includes state adult education staff, PD providers and local ABE instructors and administrators.

The Minnesota PD system uses a data-driven planning process to identify PD needs and set priorities for each year. The results of an annual statewide PD needs assessment of local providers, along with evaluation data from previous PD efforts, research regarding best practices, and federal recommendations are used to inform PD priorities and the design and delivery of PD activities. Professional development activities are designed to include research-based features of effective professional development – longer-term, job-embedded activities with opportunities for collaborative participation and the application of new knowledge and skills. Both statewide and regional opportunities are provided for adult educators to develop and share their knowledge and skills in order to improve the quality of instruction delivered in local programs. These PD activities include professional learning communities, study circles, statewide and regional conferences, online courses, webinars, and others. Evaluation of PD outcomes, especially evidence of teacher change and quality of implementation of new knowledge and skills, is integrated into every initiative to ensure the effectiveness of PD activities.

State leadership funds will be used to support professional development activities that focus on a variety of areas of emphasis, including content standards implementation, evidence-based reading instruction (EBRI), adult learning, research-based instructional methodologies, volunteer training and management, effective program management, integrated education and training and , transition to postsecondary, employment and training, use of technology, distance education, universal design, serving students with disabilities, volunteer training and recruitment, and DEI (Diversity, Equity and Inclusion).

The MDE adult education office contracts for professional development services related to research-based literacy, numeracy, English language instruction, content standards, and transitions. These PD activities include EBRI (Evidence-based Reading Instruction) webinars and workshops, online courses, and resource dissemination; a cohort-based foundational training on teaching numeracy to adults; and the implementation of content standards. More information regarding existing training provided may be viewed on the ATLAS (ABE Teaching and Learning Advancement System) homepage: www.atlasabe.org.

In addition, the MDE adult education office contracts to deliver professional development and technical assistance in the arena of serving adults with disabilities and to maintain a disabilities website: <https://pandamn.org/>. The disabilities website has received considerable national attention and is used by adult education professionals across the country. The disabilities service provider also provides training on using Universal Design for Learning principles and strategies to address the varied needs of adult learners. All disability-related activities are consistent with and contribute to implementation of Minnesota's Olmstead plan.

The MDE adult education office contracts to provide statewide services in the areas of volunteer tutor training, volunteer management, and client referral services (an online Literacy Hotline and a phone hotline). The services are described in detail at: www.literacymn.org.

C. THE PROVISION OF TECHNICAL ASSISTANCE TO ELIGIBLE PROVIDERS OF ADULT EDUCATION AND LITERACY ACTIVITIES RECEIVING FUNDS UNDER THIS TITLE, INCLUDING—

- The development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training;
- The role of eligible providers as a one-stop partner to provide access to employment, education, and training services; and
- Assistance in the use of technology, including for staff training, to eligible providers, especially the use of technology to improve system efficiencies.

MDE will deliver technical assistance to eligible providers to enhance program effectiveness, increase the ability of providers to meet established performance standards, and fulfill obligations associated with being a one-stop partner. Specific areas of focus will include:

(1) Increasing the capacity of instructors and programs to provide quality instruction in the areas of reading, writing, speaking, mathematics, English language acquisition, and distance education via implementation of professional development activities and associated technical assistance such as:

- EBRI online courses and workshops;
- Annual Language and Literacy Institute;
- Annual Math Institute;
- Adult Career Pathway and IET (Integrated Education and Training) workshops and institutes;
- Distance and Blended Learning Basics for Minnesota Adult Education online course;
- Distance learning professional development cohorts;
- Minnesota distance learning website; and
- Online resource libraries in the areas of ACES (academic, career, and employability skills), adult career pathways, adult diploma/high school equivalency, adult education staff orientation, CCR standards, cultural competency, ESL, numeracy, project-based learning, reading, science, social studies and civics, and writing

(2) Enabling providers to establish, build upon, or maintain effective relationships with other core providers via training on referral systems, data sharing/reporting, integrating education

with occupational training, and transition strategies for postsecondary enrollment or employment.

(3) Using technology to improve program effectiveness through training and technical assistance focused on preparing instructors and program administrators to identify and utilize technology to enhance instruction, programming, and distance education. The MDE Adult Education Office contracts with supplemental service providers to provide professional development in the area of educational technology, digital literacy instruction, and distance learning through activities such as face-to-face and online training. More information about current technology training can be found at: www.literacymn.org/distancelearning-PD. Training and technical assistance around distance education and digital literacy is also offered through a contracted provider. More information about current training and resources can be found at: www.literacymn.org/distancelearning.

In addition, other training and technical assistance focuses on the effective use of the statewide data system to maintain accurate student data and continuously improve programming. This support is offered in a variety of formats and venues.

D. THE MONITORING AND EVALUATION OF THE QUALITY OF, AND THE IMPROVEMENT IN, ADULT EDUCATION AND LITERACY ACTIVITIES AND THE DISSEMINATION OF INFORMATION ABOUT MODELS AND PROVEN OR PROMISING PRACTICES WITHIN THE STATE.

MDE will provide grantee oversight to include data monitoring, site visits and a program improvement process for low performing grantees. The following strategies will be implemented:

- Data Reviews – The statewide MIS (SiD) has local and state-level reports to facilitate ongoing review in the areas of assessment, attendance and compliance. In addition, the MDE Adult Education team meets with SiD staff monthly to review current data issues and providers flagged through the technical assistance and reporting processes.
- Monitoring Calls and Visits – MDE creates monitoring visits for the following grantees: 1. all grantees have a visit as part of the five- to six-year state reauthorization process; 2. grantees identified via data review with issues that get escalated by the MDE Adult Education team and SiD staff due to a need for more in-depth investigation; 3. grantees flagged as low-performing during the program improvement process; and 4. grantees that are part of a state or federal initiative where a visit is deemed an important part of the process; and 5. Grantees or providers that request monitoring visits. Monitoring calls and visits can be virtual or in-person. Monitoring visits focus primarily on compliance-related issues but additional issues can be included by the grantee, the provider, and/or the MDE Adult Education team. (For more information on monitoring visits, please see the response to (f) below.)
- Reauthorization process (State ~~five-year~~ narrative application) - The ~~five-year~~ state narrative process, based on requirements outlined in Minnesota State Statute 124D.52, subd. 2, is designed to give Adult Education grantees (re)authorization for state ABE funding through a comprehensive online narrative. This narrative asks grantees to

describe programs through data, organizational structure, procedures, goal setting, and more. This narrative process is reviewed by a team of adult education staff at the state and provider level. Review teams look for adherence to state/federal requirements and best practices. The narrative development is a one-year process on average that includes:

- Attending review sessions of prior year consortiums;
 - Attending a workshop on narrative requirements;
 - Hosting site visits that include MDE Adult Education staff;
 - Completing additional tasks not rated as satisfactory as a corrective action follow up; and
 - Receiving additional technical assistance from MDE and other adult education specialists, as needed.
- Program Improvement Process - Local providers that fall significantly below state and federal program performance targets and grant expectations will be subject to a program improvement process. Over the course of one year, a provider in program improvement will:
 - Host site visits from staff from MDE;
 - Participate in workshops focusing on analyzing and improving local program results;
 - Develop a program improvement plan that will highlight key local challenges, ensure program compliance with state and federal policy, and identify strategies and timelines to improve program performance; and
 - Receive additional technical assistance from MDE and other adult education specialists, as needed.

The program improvement process will last at least one program year. The grantee will have successfully completed the process once they: develop and implement a program improvement plan that is approved by the MDE Adult Education team; adhere to grant and program improvement expectations as established by the MDE Adult Education team; and show acceptable student outcomes (based on state and federal targets) at the end of the process through the annual grant performance reports. Grantees that continue to fall significantly below state and federal targets and grant expectations will be subject to participate in program improvement again. Grantees that fall significantly below state and federal targets and do not meet grant expectations three consecutive years, may be subject to a special review by MDE to determine if the grantee should continue to receive AEFLA funding.

Regarding sharing best practices, the Minnesota Adult Education team and professional development providers will employ a variety of methods to ensure that information about proven or promising practices and models is disseminated to eligible providers and practitioners working in the Adult Education system. These will include activities such as:

- Local program site visits, as described in f.5 below;

- A weekly electronic professional development newsletter with information about training opportunities, high-quality resources, and promising practices for instruction and programming;
- ABE foundations (available in person or online), a required orientation to Minnesota's ABE system;
- Sessions at state and regional conferences showcasing promising practices and models;
- Webinars showcasing promising practices and models; and
- Job-embedded professional development activities, including professional learning communities, study circles and peer observations.

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

Some of the WIOA Adult Education Leadership funds will be used to support permissible leadership activities in a variety of areas including: professional development; volunteer training and outreach; technology and distance education training; assessment and support staff training; disability-related training and support; transitions and workforce development services; ~~and other statewide initiatives; and racial equity in adult education.~~

~~Racial equity is a key priority for the Minnesota adult education system. In order to advance this priority, state funds have been allocated to support a grant focused on racial equity in adult education. This grant supports racial equity work at both the state and program level.~~

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

MDE assesses adult education and literacy activities and supports program quality through accountability expectations and procedures that focus on both compliance and best practice according to research and experience. The expectations and procedures include:

1. THE STATE ADULT EDUCATION MANAGEMENT INFORMATION SYSTEM (MIS)

DATA: Minnesota's MIS, called SiD, balances both program quality and program compliance with state and federal expectations. In addition to required reports, local providers can use SiD to analyze student persistence, program outcomes, and other measures at the consortium, site, class and student level.

2. A STATE ADULT EDUCATION GRANTEE REPORT CARD: The report card notes actual performance and ranks providers by key program data measures, including measurable skill gain by population, cost of programming per individual served, intensity of service provided, and percentage of population served.

3. A PROGRAM IMPROVEMENT PROCESS: Programs will be identified for review based on rankings in the state adult education report card and will undergo a comprehensive review and monitored implementation of a program improvement plan that requires local providers to

complete site visits, workshop activities, reports, and plans to strengthen program performance and quality. (For more information on Program Improvement, see the response to (D) above.)

4. INTENSIVE PROGRAM APPLICATION CYCLE: On a five- to six-year basis, adult education providers are required to complete an in-depth application as a method to adhere to state statute governing local adult education programming. In this intensive application, local providers describe their:

- Consortium,
- Program accountability procedures,
- Professional development priorities and activities,
- Proposed programming,
- Local program governance,
- Program collaboration with key stakeholders and partners,
- Technology resources and integration,
- Future plans, and
- Performance.

These in-depth applications are reviewed and scored by a team of state staff from MDE and local AEFLA providers.

5. GRANTEE MONITORING SITE CALLS AND VISITS: All grantees are subject to monitoring calls and site visits that focus on policy compliance and program quality through multiple methods:

- All AEFLA grantees receive site visits on a rotating basis, at least once every five-to-six years, when the program participates in in-depth application process to continue receiving state adult education (ABE) funding to comply with state statute;
- Monitoring visits based on items that get escalated by the MDE Adult Education team through the monthly data review process;
- Providers with low performance participate in site visits through the program improvement process;
- Local adult education providers that participate in state initiatives and/or receive special grants through state or federal funding typically receive site visits as part of their participation; and
- Local providers request special technical assistance site visits as they face issues.

PROFESSIONAL DEVELOPMENT FOR PROGRAM IMPROVEMENT

If areas of weakness or need are identified through one of the above processes (report card, program improvement, program application review, and/or monitoring calls/visits), MDE may require or recommend that the provider participate in professional development (PD) that will address that area of weakness or need. If participation in a particular PD opportunity is

required by MDE as part of a program improvement plan or a required action, the program must confirm its participation in that PD with MDE.

Some examples of program evaluation findings and corresponding professional development responses include:

- If a review of a program's student outcomes reveals low performance at the Intermediate ABE levels, they will be required or encouraged to participate in a ~~STAR cohort or~~ EBRI course.
- If a program's MSGs are low or if their instructional program descriptions are not adequately focused on College and Career Readiness Standards (CCRS), they will be encouraged or required to participate in a CCRS Foundations Course or other CCRS-focused professional development~~Implementation Cohort~~.
- If a program is interested in expanding its distance learning programming or if a review shows a lack of strategic planning around distance learning, the program will be encouraged to participate in the Best Practices in Digital Learning Cohort~~Distance Learning 101 Cohort~~.

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" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

AUTHORIZING OR CERTIFYING REPRESENTATIVE

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any

Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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	Minnesota Department of Education
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
First Name	Willie

APPLICANT'S ORGANIZATION	Enter information in this column
Last Name	Jett
Title	Commissioner, Department of Education
Email	mde.commissioner@state.mn.us; brad.hasskamp@state.mn.us

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.

- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

GEPA Section 427 Instructions to State Applicants for their Subrecipient Applicants

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

- The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or
- The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.
- The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The Minnesota Department of Education (MDE) has adopted ten commitments to equity to prioritize our work, which are addressed through the MDE leadership communications and policies

(https://education.mn.gov/mdeprod/idcplg?IdcService=GET_FILE&dDocName=MDE073769&RevisionSelectionMethod=latestReleased&Rendition=primary). These practices are implemented through the Due North Education Plan and MDE's Strategic Plan, which can be

found online (<https://education.mn.gov/MDE/about/plan/>). The strategies in the plans focus on the following objectives:

- Every student deserves a world-class education.
- Every student deserves to attend a safe, nurturing learning environment.
- Every student deserves to learn in a classroom with caring, qualified teachers.
- Minnesota Department of Education will provide leadership, support, and partnership to every public school district across the state.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The primary barriers that could impede equitable access and participation include insufficient resources for programming, a lack of geographic access to programs, and programs not being inclusive of all potential learners (e.g. programs not practicing culturally inclusive practices or universal design principles).

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Acknowledging the issue of limited resources, the State of Minnesota has allocated an average of \$8-9 of state funding for Adult Education for every \$1 of federal Adult Education funding to help ensure a robust Adult Education system in Minnesota. This commitment to Adult Education access and equity is shared by the state legislature, governor, Department of Education, and many others.

The MDE Grants Office ensures that a fair and equitable process is followed that allows all eligible entities the opportunity to apply for the grant.

MDE requires that Adult Education grant applicants describe the race/ethnicity and other demographics of the student population served in comparison to the demographics of the geographic area served. In addition, applicants must describe how they plan to address equitable access to and participation in programming for all members of the communities they serve; how they will build a common understanding of equity among program staff; and what staff professional development regarding equity they will provide. MDE monitoring activities include reviewing: dis-aggregated enrollment data in comparison with K-12 Limited English Proficiency enrollment and local demographic data; agency outreach, intake and course placement practices; agency program course and progression structures; and implementation of the above noted plans.

The Minnesota Department of Education supports Adult Education providers in addressing equity by providing both program supports and professional development through a several competitive state and federally (leadership) funded Supplemental Services grants. The Supplemental Service grants are competed every three years and include grants focused on providing services for students with disabilities; using instructional technology including distance/asynchronous learning; and instructional methodology including evidence-based practices in reading (~~STAR~~) and math; and ELL instructional best practice. Program supports provided by Supplemental Services grantees include: a web site focused on providing services to participants with disabilities, an accommodations resource lending library, outreach materials, and statewide access to technical assistance from specially trained staff. Professional development opportunities available to all Adult Education program staff include Universal Design, inclusive programming, cultural competency, mental health, shared programming, career pathway development, course design and other topics. The Minnesota Department of Education (MDE) requires that Adult Education grant applicants describe the racial and other demographics of the student population served in comparison to the demographics of the geographic area served. In addition, applicants must describe how they plan to address equitable access to and participation in programming for all members of the communities they serve; how they will build a common understanding of equity among program staff; and what staff professional development regarding equity they will provide. MDE monitoring activities include reviewing: dis-aggregated enrollment data in comparison with K-12 Limited English Proficiency enrollment and local demographic data; agency outreach, intake and course placement practices; agency program course and progression structures; and implementation of the above noted plans. The Minnesota Department of Education supports Adult Education providers in addressing equity by providing both program supports and professional development through a several competitive state and federally (leadership) funded

Supplemental Services grants. The Supplemental Service grants are competed every three years and include grants focused on:

- providing services for students with disabilities;
- using instructional technology including distance/asynchronous learning;
- instructional methodology including evidence-based practices in reading and math/numeracy and instructional best practices working with English Language Learners; and
- identifying and analyzing equity issues in Adult Education using a racial equity lens.

Program supports provided by Supplemental Services grantees include: a web site focused on providing services to participants with disabilities, an accommodations resource lending library, outreach materials, and statewide access to technical assistance from specially trained staff. Professional development opportunities available to all Adult Education program staff include Universal Design, inclusive programming, cultural competency, mental health, shared programming, career pathway development, course design and other topics.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

The timeline for this work is annual, starting with each grant application materials and process. The first milestone will be April 20, 2024, with the posting of the Adult Education (ABE) continuing grant application for federal and state funding. The process will continue with technical assistance, professional development, monitoring, and data analysis of program outcomes, which occurs throughout the grant year. The next major milestone will be March 2028 when the next federal Adult Education grant competition is planned.

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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	<u>32.0%</u>		<u>32.1%</u>	
Employment (Fourth Quarter After Exit)	<u>32.75%</u>		<u>32.85%</u>	
Median Earnings (Second Quarter After Exit)	<u>\$8,750</u>		<u>\$8,760</u>	
Credential Attainment Rate	<u>35.3%</u>		<u>35.4%</u>	
Measurable Skill Gains	<u>37.0%</u>		<u>38.0%</u>	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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

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The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

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Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1	11/2023
Parent Training and Information Center	1	~~03/2025~~ 11/2023
Client Assistance Program	no term limit	04/2024
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if	~~1~~ 2	02/ ~~2022~~ 2025

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Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Employed by the VR Agency)		
Community Rehabilitation Program Service Provider	1	09/2024
Business, Industry, and Labor	1	04/2024
Business, Industry, and Labor	vacant	-
Business, Industry, and Labor	1 1 2 2	04/2024 02/2022 02/2025 02/2025
Business, Industry, and Labor	1	11/2023
Disability Advocacy Groups	1 1 vacant	12/2023 09/2024 09/2024
Current or Former Applicants for, or Recipients of, VR services	2 1 1 1 vacant 1 1	01/2023 - 03/2024 12/2023 03/2024 2025
Section 121 Project Directors in the State (as applicable)	No term ~~limit~~ limits No term ~~limit~~ limits	05/2020 02/2025 04/2024
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1vacant	11/2023-

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Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
State Workforce Development Board	vacant ²	1/2023
VR Agency Director (Ex Officio)	No term limits	
-	-	-
-	-	-

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3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

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Currently, [119](#) of ~~the 1816~~ voting members ~~disclosed~~[disclosed](#) a disability. ~~We strive to meet the requirement of 50% or greater representation by individuals with disabilities.~~

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

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In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

The Minnesota State Rehabilitation Council-General meets as a full council 10 times per year. Each meeting is planned to provide its members with education about VRS programs and projects, as well as to inform the council on status and trends. Much of the input from the SRC comes through dialogue that occurs during meetings and are captured in meeting minutes.

- ~~Public Awareness was identified~~[February 2025 - SRC recommendations around eligibility and priority for service: Training and Quality Assurance:](#)
 - [Consider how to ensure no SFLs have been missed if not all information is included in the record.](#)
 - [Counselors should attempt to have at least one meeting in person with a participant before making referrals.](#)
 - [Consider data from the Client Assistance Project as an area a barometer for success of focus so the individuals we serve reflects the population of training.](#)
- ~~March, May 2025 – SRC recommendations made during the State of Minnesota. During meetings held specifically around this topic and analysis of the review of the~~ Comprehensive

Statewide Needs Assessment, ~~the SRC identified the following underserved populations for which:~~

- ~~Look at what level of education participants have completed in relation to placements.~~
 - ~~Look at placements and sequences to see how many people come back after 3 years to look for career progression to help determine the need for services to returning clients.~~
 - ~~Look at the incidence of customized employment.~~
 - ~~Analyze why individuals leave VR services without employment~~
 - ~~Include analysis of the quality of placements~~
 - ~~Increase touchpoints with business~~
 - ~~Track number of businesses that VR connects with and maintain or increase efforts in this area.~~
 - ~~Expand job readiness training for youth, providing earlier connections to job coaching and supported employment.~~
 - ~~Increase rates for customized employment. Providing those services is not cost effective for community partners.~~
 - ◆○ ~~Ensure there should be additional outreach efforts in a consistent manner in which transfers occur between counselors~~
- ~~Late diagnosed June 2025 – Budget recommendation:~~
 - ~~Track “trickle down” effects of budget difficulties (how are partners affected?)~~
- ~~June 2025 – Introductory Career Services recommendations:~~
 - ~~Include individuals with autism disabilities using the services when re-designing those services~~
 - ~~Students in a virtual school setting, private schools and home schooled~~
 - ~~Individuals who identify as Black, Indigenous, or People of Color~~
- ~~Following analysis of VRS efforts around staff recruitment and retention, August 2025 – Collect data on the SRC made impact of funding cuts to Community Partners.~~
- ~~September 2025 – Introductory Career Services recommendations around maintaining internal talent.~~
 - ~~Improve recruitment efforts and application process for VR positions~~
 - ~~Develop internal business resource groups~~
- ~~During an annual review of community partnerships, the following recommendations were made to bolster relationships with external partners:~~
 - ~~Ensure statewide coverage of Partner with CareerForce to develop a “job club” specific to students where they can talk to someone about getting a job, get some extra help, etc.~~
- ~~October 2025 – VRS Goals, Priorities and Strategies in the VR Portion of the Combined State Plan~~

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- Spell out “physical and mental” when referencing disability for clarity to external stakeholders.
- Use the terms “participant” or “stakeholders” in place of “customers.”
- Ensure strategies include using stakeholder feedback as continuous improvement tool to inform decisions, refine strategies, and strengthen service outcomes.
 - Add participant and community partners
 - Train providers on customized employment
 - Continue to build strong relationships with tribal nations
 - Educate employers about supporting employees with disabilities at all levels
 - Reach out to business DEI divisions and talent managers more frequently
 - The job coach shortage was identified as critical
- The SRC provided input during a focused session on the application to eligibility process at the April 2023 meeting:
 - Recommendations to improve services in general:
 - * Involve youth and adults with disabilities in decision making
 - * Ensuring consistent benefits coaching for participants
 - Recommendations to improve the application to eligibility process:
 - * Improve communication and make it simple to understand
 - * Develop an online portal for participants to track application status online
 - * Make paperwork as painless as possible
- The SRC approved the opening of Category 4 at its June 2023 meeting.
- The SRC approved a moratorium on Consumer Financial Participation (CFP) at its June 2023 meeting, to be re-evaluated in March 2024.
- Reducing ethnic/racial disparities in service provision and outcomes was identified as a top priority in January 2023.
 - ○ The SRC would like partner feedback to VRS to explore the relationship between credential attainment of measurable skills gains (MSGs) and employment outcomes/employee performance reviews.
- At its October 2023 meeting, the SRC approved the purchase of virtual reality goggles for each VRS office to be used for career exploration. The council also suggested using them for skill verification in the discovery process.
- The SRC provided the following input at the January 9th Add participant review and 23rd public meetings regarding closing categories:

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- Concerns were raised about the subjectivity of assignment to priority categories and for individuals in categories 2-4 unfairly bearing the burden of budget difficulties.
- Recommendation to analyze VRS spending and effectiveness.
- Council members recommend the formation of a task force to explore better ways of determining priority categories that ensure that “individuals with the most significant disabilities are selected feedback for services before all other individuals with disabilities” in the future.
- Concern that OOS would have a disparate impact on:
 - * people who have not had reliable access to healthcare
 - * those who struggle to communicate their impairments
 - * populations who have had their disability mis-conceptualized as “behavioral issues” or “character flaws”
 - * individuals with hidden disabilities in general
- Council member recommends analyzing customer satisfaction data at the priority for service level.
- Five of the 13 voting members present at the meeting on January 23, 2024, support the closing all categories as needed, six support closing of categories 2-4 only. Two were not in favor of closing any categories.
- The SRC provided the following input at the January 9th and 23rd public meetings regarding lifting the temporary moratorium on Consumer Financial Participation, which had been in place since July 2023 due to COVID flexibilities:
 - Concerns were raised about the financial burden of lifting the moratorium on CFP as well as individuals needing to submit personal financial data as part of the process of determining CFP.
 - Concern that the harm that CFP could potentially cause for individuals far exceeds the savings projections.
 - Eleven of the 13 council members present at the meeting on January 23, 2024, recommended that VRS not re-institute Consumer Financial Participation. Two members abstained from voting tech development.

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5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

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List each recommendation/input followed by the VR agency response

- Provide additional outreach efforts to identified groups.
 - VRS Response: VRS recognizes the need to provide additional outreach efforts to the groups identified as underserved in the CSNA and plans to bolster efforts in

this area. A Communications & Outreach Manager was hired to lead this work. VRS is very focused on building a workforce that best represents the participants we serve. VRS is actively hiring more employees with disabilities to fill open positions including through the C700 State of Minnesota Disability Hiring initiative. The C700 program ensures a non-competitive interview for people with disabilities who have a C700 certification through the State of Minnesota. Once on board, the C700 candidate has up to 700 hours to demonstrate their ability to meet the essential job functions. VRS is also building a workforce that represents participants through hiring efforts that include creative and expansive recruitment efforts. VRS works closely with our DSA Human Resources Specialists who are connected to an expansive array of marketing options to reach underrepresented communities. VRS recognizes that many underserved groups are hesitant to work with the government or consider entering a government building. VRS developed an In-Home Services workgroup to discuss, develop, pilot and implement training and guidance for VRS staff to meet with participants in their home. VRS' goal is to expand the meeting location options for staff to meet with participants in order to create more person centered options, including where they are most comfortable.

- Improve recruitment efforts and application process for VR positions.

- VRS Response: VRS has made great improvements in this area already through a number of measures, including:

- Resources

- Hiring dedicated HR recruitment/hiring staff—2 for VRS in centralized agency
 - Designating a dedicated HR liaison with VRS to streamline communications, maintain an organizational chart, track all positions and vacancies, and navigate the internal personnel transaction record system

- Process

- Updating job posting language to remove VR jargon, with more plain language.
 - Using continuous postings versus time limited
 - HR is sharing an agency-wide weekly bulletin listing all job vacancies
 - HR created a landing webpage for DEED jobs, separated from all State of MN jobs
 - Reconsidered minimum qualifications, including degree requirements for some positions
 - Created an entry-level Counselor role primarily to serve Pre-ETS

- Culture
 - VRS leaders hold weekly meetings with HR and share a digital workspace
 - Established telework/hybrid work environment and more flexibility
 - Initiated pay equity reviews
 - Initiated Pay Range Reassignment for multiple positions including counselors
 - Developed a staff engagement model utilizing focus groups
 - Are strengthening internal training and mentorship to develop skills and experience
 - Creating career pathways utilizing the existing classification pathways
- Monetary Incentives
 - Paid graduate level internships
 - Instituted hiring and referral incentives
 - Relocation expense reimbursement
 - Tuition reimbursement (75%) for VR graduate school courses
 - Achievement Awards
- Bolstered recruitment efforts
 - Linked-in recruiting
 - Non-profit and free job boards
 - Career Fairs—Veterans, Disability, People of Color
- Develop internal business resource groups
 - VRS Response: Several employee resource groups have formed at the DSA level.
- Ensure statewide coverage of community partners
 - VRS Response: VRS is looking across the state to see where there are pockets without community partner choices. VRS is networking with staff, school personnel, and others in the field to encourage additional providers to become Community Rehabilitation Providers or Limited Use Vendors. VRS is holding Community Rehabilitation Partner in-person meetings to ensure that VRS is listening and aware of the opportunities and challenges for Community Rehabilitation Providers. VRS is being intentional in setting expectations for VRS

staff to be aware of and utilize vocational services available by providers that specialize in serving un-served and underserved populations.

- Train providers on customized employment

- VRS Response: VRS continues to receive referrals of participants who are either earning or considering earning subminimum wages. Over 4,000 people continue to work in subminimum wages each year. This number does not include the hundreds of students VRS serves who have significant barriers to working in competitive, integrated employment. DEED-VRS partners with Minnesota State Operated Community Services (MSOCS) to deliver Minnesota Customized Employment (MN-CE) Training to interested providers statewide. Until FFY24, the customized employment trainers consisted of both Department of Human Services (DHS) and VRS employees. Participants were charged \$725 per person to attend training. VRS receipted these funds as program income and those dollars were used to pay for the wages and fringe benefits of VRS staff who conducted the CE training. VRS accounting used actual payroll data for the specific employees who were to conduct the training to determine a fee that would enable recovery of payroll costs as closely as possible. Beginning in FFY24, DHS assumed all costs for CE training, and VRS is not funding this training to providers at this time. This training is now offered at no cost to providers as an opportunity to engage more providers. MN-CE training is offered virtually at least three times per year. Each MNCE participant completes 9 training sessions, is connected to a "learning partner" who is a VRS participant in need of a Customized Employment Discovery process. MN-CE participants also receive mentoring hours to support the practical application learning and ensure that the learning partner has a completed CE-Discovery process. The MN-CE Training is Association of Community Rehabilitation Educators (ACRE)-certified. Minnesota was the first state agency to become ACRE-certified in Customized Employment. To provide Customized Employment services, Community Rehabilitation Provider practitioners must have completed ACRE-certified Customized Employment training. In addition, the practitioner must pass a Competency Review Process which includes a review of the completed CE-Discovery document. VRS' Customized Employment Specialist utilizes a rubric to determine whether the CE practitioner meets standards.

- Continue to build strong relationships with tribal nations

- VRS Response: VRS has recently renewed efforts to engage with tribal nations. Currently VRS' relationship with the White Earth nation is strong and effective. VRS' efforts to engage with the Red Lake Nation has been growing thanks to the efforts of Red Lake Schools teachers and VRS staff who are ensuring Pre-ETS and full-service VR are being provided to students. VRS' DSA has an American Indian liaison who is native. He has overall excellent relationship with many tribal nations in Minnesota. He has developed a process of communication with many of the tribal nations that is effective and respectful of tribal leaders' meeting expectations. VRS is meeting with the DSA tribal nation liaison to attend Tribal Nations meetings to share information about VRS. VRS is very interested in

marketing its employment opportunities to the Tribal colleges as we are very interested in recruiting more native people to work for VRS.

- Educate employers about supporting employees with disabilities at all levels
 - VRS Response: VRS Program Specialists in Placement engage with employers on a regular basis and provide education on supporting employees with disabilities at all levels using tools like DEED's Disability Inclusion: Bite-sized learning for employers modules and other disability resources. View here: <https://www.careerforcemn.com/disability-inclusion-bite-sized-learning-modules>
- Reach out to business divisions and talent managers more frequently
 - VRS Response: VRS Program Specialists in Placement try to reach out to business divisions on a regular basis to identify opportunities to partner.
- The job coach shortage was identified as critical
 - VRS Response: The workforce shortage of qualified disability employment services staff continues to be a significant challenge. VRS is in consistent communication with community rehabilitation providers regarding their workforce shortage challenges. One of the key challenges is having trained staff to deliver competent job coaching services. Community Rehabilitation Providers developed a job coach training prior to 2020, but the training has not been shared or provided. VRS is aware of another state VR program who developed a Job Coaching Training and will be exploring options to offer job coaching training to interested Community Rehabilitation providers.
- Involve youth and adults with disabilities in decision making
 - VRS Response: VRS continues to include participants in decision making through its State Rehabilitation Council and focus groups. The VRS Youth Team is in planning stages to convene a youth advisory committee comprised of students/youth with disabilities.
- Ensuring consistent benefits coaching for participants
 - VRS Response: VRS continues to include benefits coaching as an integral service to help individuals understand their benefits and the impact of work on benefits. This will be accomplished for staff by offering opportunities through both internal and external trainings and resources to support or increase their knowledge of SSA, state and local public benefits. This echoes the agency strategies and key messages listed on the MN HUB website (<https://disabilityhubmn.org/for-professionals/benefits-planning/get-ready/agency-strategies/#article-start>), which also includes an opportunity to join the MN benefit planning learning community. All MN VRS individuals identified as receiving SSA, state and local public benefits will be informed of the Benefit Planning and options for services. These options may include basic information up to a complete analysis of their benefits, reflecting their current state of the benefits to demonstrating the impact of earnings or other income on their benefits.

- Improve communication and make it simple to understand
 - VRS Response: VRS completed a comprehensive review of all printed materials in 2020 to ensure the use of plain language. This practice will be ongoing. Additionally, VRS will undertake a digital transformation in the upcoming year to ensure its programs and forms are more easily located and accessible to a wider audience.
- Develop an online portal for participants to track application status online
 - VRS Response: VRS appreciates this input and will be exploring the creation of an online portal in the upcoming year.
- Make paperwork as painless as possible
 - VRS Response: VRS completed focus groups with staff and the SRC to gather input and will be reviewing its application and other forms in the upcoming year to streamline. Some of the ideas generated include:
 - * Aligning the order of fields on the paper application and the case management system to streamline data entry.
 - * Only including required fields on the application to streamline the intake process.
 - * Eliminating the need for participants to enter the same information on multiple forms
 - * Creating a one-pager describing the application to eligibility process with easy-to-follow visuals
- The SRC approved the opening of Category 4 at its June 2023 meeting.
 - VRS Response: Category 4 officially opened, effective October 1, 2023.
- The SRC approved a moratorium on Consumer Financial Participation (CFP) at its June 2023 meeting, to be re-evaluated in March 2024.
 - VRS Response: The moratorium on CFP was effective July 1, 2023. VRS plans to watch data closely and re-evaluate with the SRC in March 2024.
- Reducing ethnic/racial disparities in service provision and outcomes.
 - VRS Response: VRS agrees this is a priority area and is taking several measures to decrease disparities in service provisions and employment outcomes.
 - * VRS initiated a workgroup called Vocational Rehabilitation Services Youth Equity Workgroup (VYEW) specifically to look at the ethnic and racial disparities in the numbers of students/youth that VRS serves, service provision, and outcomes. VRS is being intentional in taking steps to improve and increase the numbers of BIPOC students served, increasing the services they receive and increasing the number of employment outcomes that result. VYEW meets monthly to review and discuss key topics related to serving and supporting BIPOC students with

disabilities, review metrics and make recommendations to the VRS Executive Leadership Team. VVEW is ongoing and the review of metrics is ongoing.

- VRS is committed to recruiting, hiring, and retaining a diverse staff to better reflect the participants that we serve.
- VRS has increased its training opportunities around serving underrepresented populations.
- Explore the relationship between credential attainment of measurable skills gains (MSGs) and employment outcomes.
 - VRS Response: VRS agrees this is an important area but thinks this may be better examined at a national level.
- Order of Selection
 - VRS Response: VRS appreciates input and concerns expressed around the impact of closing categories and has put several additional cost saving measures into place, which we have shared in SRC meetings, including:
 - Hiring freeze in place since Sept 2024
 - Increased internal controls of case services and how we authorize for services
 - VRS staff providing more direct placement and pre-ETS services where feasible rather than contracting all of those services out
 - Review and decrease in operations costs: physical rental space, leased cars, outstate conferences, etc.
 - Reduction in staff hours (temporary or permanent)
 - Retirement incentives, which has large up-front costs
 - Staff layoffs, which has large up-front costs

Forecasting indicates a steep increase in costs compared with flat funding, and this results in the need to additionally close categories and utilize a waitlist for new applicants. VRS continues to provide training and guidance to standardize the determination of functional limitations and resulting priority for services. As with any human-driven process, a certain degree of variability is to be expected. VRS seeks to make the process as objective as possible through a circular process of training, guidance, and quality review for VRS staff. Additionally, VRS is launching a central intake unit to complete all eligibility and PFS determinations for most adult applicants, which will aid in standardizing the process.

- Consumer Financial Participation (CFP): Based on the feedback and strongly expressed concerns from SRC members and public hearing comments, VRS will continue the temporary moratorium on CFP and develop a workgroup to assess the need to pursue a rule change. It may be necessary to reconsider the moratorium given the fiscal challenges.

- February 2025 - SRC recommendations around eligibility and priority for service: Training and Quality Assurance:
 - Consider how to ensure no SFLs have been missed if not all information is included in the record.
 - VRS response: The following measures have been completed or implemented to ensure SFLs are not missed:
 - Early in 2025, RAMs and the QA specialists led team trainings on Serious Functional Limitations (SFLs) to strengthen understanding of each SFL category.
 - The QA specialists provided two Learning Labs in March to support understanding of the casework expectations around Eligibility and Priority for Services (PFS) determinations.
 - In March and April, the QA specialists conducted two series of case reviews on Eligibility and Priority for Services for the Virtual Intake Unit (VIU) team, which was responsibility at that time for adult intakes. In follow-up to the reviews, the QA manager and VIU team manager provided training for the team.
 - The QA team is beginning a new review cycle, which will include a review of work on Eligibility and PFS determinations. Any discrepancies or inaccuracies in the work reviewed will be shared with VR counselor and RAM, and training will be provided to ensure understanding.
 - Local teams host case consultations where staff bring cases they would like to review with the group.
 - Trainings in YesLMS learning management system, which staff can take asynchronously to support understanding of the work:
 - Serious Functional Limitations (SFL) course
 - Eligibility for VR Services training
 - VRS Application 2.0: Beyond the Boxes
 - Counselors should attempt to have at least one meeting in person with a participant before making referrals.
 - VRS response: Counselors receive person-centered training and should be offering meeting options. VRS will ensure this is part of clinical supervision by managers.
 - Consider data from the Client Assistance Project as a barometer for success of training.
 - VRS response: VRS consults with the Client Assistance Project (CAP) on a regular basis and addresses issues as they arise. The CAP representative is both a member of the SRC and the VRS Policy Core group and has provided qualitative data with a trend toward fewer complaints.
- March, May 2025 – SRC recommendations made during the final review of the Comprehensive Statewide Needs Assessment:

- Look at what level of education participants have completed in relation to placements.
 - VRS response: VRS will take this into consideration for the 2028 CSNA.
- Look at placements and sequences to see how many people come back after 3 years to look for career progression to help determine the need for services to returning clients.
 - VRS response: Federal reporting requirements recently changed around employment status at plan development, which will help to address this request regarding individuals seeking services to assist with career advancement.
- Look at the incidence of customized employment.
 - VRS response: VRS monitors this information and will share at an SRC meeting during Program Year 2025.
- Analyze why individuals leave VR services without employment
 - VRS response: VRS recently launched a new participant evaluation survey, which includes surveying all individuals who exit and will analyze reasons for exit.
- Include analysis of the quality of placements
 - VRS response: VRS will work with the newly formed "SRC Quality and Needs Assessment Committee" and requests assistance with objective definitions and metrics for "quality of placements."
- Increase touchpoints with business
 - VRS response: VRS is piloting the use of Salesforce software to track businesses with whom we engage.
- Track number of businesses that VR connects with and maintain or increase efforts in this area.
 - VRS response: VRS is piloting the use of Salesforce to track businesses with whom we engage.
- Expand job readiness training for youth, providing earlier connections to job coaching and supported employment.
 - VRS response: In September 2025, VRS implemented a new approach to providing Introductory Career Services primarily virtually to increase reach across the state. VRS will provide the information school staff need to help students register for and complete online courses that address unmet career development needs. Courses will be free and offered at various times throughout the school day.
- Increase rates for customized employment. Providing those services is not cost effective for community partners.
 - VRS response: VRS is considering the cost of customized employment placement. At this time, due to budget forecasts, there is no plan to increase rates.

- Ensure there is a consistent manner in which transfers occur between counselors
 - VRS response: VRS has developed a new person-centered process for interoffice transfers and will continue to evaluate intraoffice transfers.
- June 2025 – Budget recommendation:
 - Track “trickle down” effects of budget difficulties (how are partners affected?)
 - VRS response: VRS tracks data about services provided by partners. We do not collect data about partners’ staffing and budget impacts. We can work more with partners to determine a data dashboard that may be useful for them.
- June 2025 – Introductory Career Services recommendations:
 - Include individuals with disabilities, using the services, when re-designing those services
 - VRS response: There will be opportunities to receive ongoing input from students. Students have the opportunity to complete an evaluation at the completion of each class.
- August 2025 – Collect data on the impact of funding cuts to Community Partners.
 - VRS response: VRS tracks data about services provided by partners. We do not collect data about partners’ staffing and budget impacts. We can work more with partners to determine a data dashboard that may be useful for them.
- September 2025 – Introductory Career Services recommendations
 - Partner with CareerForce to develop a “job club” specific to students where they can talk to someone about getting a job, get some extra help, etc.
 - VRS response: VRS has a basic course schedule planned to get the new Introductory Career Services model started for now. When these are all in place we will consider how to add a job club option.
- October 2025 – VRS Goals, Priorities and Strategies in the VR Portion of the Combined State Plan
 - Use the terms “participant” or “stakeholders” in place of “customers.”
 - VRS response: VRS agrees with this approach and updated this document accordingly.
 - Ensure strategies include using stakeholder feedback as continuous improvement tool to inform decisions, refine strategies, and strengthen service outcomes.
 - VRS response: VRS agrees with this approach and will work with the SRC to identify additional ways to solicit input and feedback from stakeholders in the future.
 - Add participant and community partner feedback to VRS employee performance reviews.
 - VRS response: VRS follows the DEED-prescribed employee performance review process and already solicits partner insights.
 - Add participant review and feedback for any tech development.
 - VRS response: VRS agrees with this approach and will work with the SRC to identify additional ways to solicit input and feedback from stakeholders in the future.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

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Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT:

Several initiatives are underway to serve individuals with the most significant disabilities. E1MN is Minnesota's state agency partnership to advance Employment First outcomes for youth (students) and adults with disabilities. The Minnesota Department of Human Services, Department of Education, and the Department of Employment and Economic Development work together to deliver a more seamless and timely employment support system. The second year of the E1MN initiative recently concluded. Over 3,100 individuals on a Medicaid waiver received Vocational Rehab Services/State Services for the Blind (VRS/SSB) services last year, an 18% increase from the first year. Over 550 of those individuals found stable employment, a 49% increase from the year prior. Nearly half of all individuals who exited from VRS/SSB did so successfully.

In the 2021 special legislative session, the Minnesota Legislature set up the Task Force on Eliminating Subminimum Wages (Task Force). The Task Force completed its legislative report in February 2023, including twenty recommendations. Some of the recommendations include: improving transitions between VRS/SSB and waiver services and increasing collaboration and opportunities for work experiences between schools and VRS/SSB. Between 4,000 and 4,800 Minnesotans earned subminimum wages in 2022, one of the highest rates of subminimum wage earning in the country. In 2022, Minnesota received a six year, \$13M Disability Innovation Fund (DIF) grant, to serve individuals working or contemplating working in subminimum wage jobs.

One area of need is adults with serious mental illness. Minnesota VR has seen a decrease in adults applying for VR services and a need for additional engagement and training for new staff.

The most recent CSNA was completed in August 2025 with input from the SRC. The following needs were identified:

- The number of participants with the most significant needs are increasing, along with a rising need for supported employment.
- There is a need to sustain access to Customized Employment and a high need for job coaching services.
- There is a need to continue to promote competitive integrated employment.
- Individuals with intellectual disabilities (ID) were identified as the group with the highest number of functional limitations yet experience significant improved quality of life when they are employed.
- Individuals with autism demonstrated high needs across all age groups, but adults with autism were less likely to have a plan for supported employment.

- There remains a great need to increase understanding and use of Benefits Planning tools to help VRS participants who receive Social Security Administration (SSA) benefits understand current and future impacts of employment and income changes.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Minnesota has identified racial disparities in the percent of VR applicants who complete their employment plan. Among youth, Hispanic/Latino youth are well represented but Black/African American youth are slightly underrepresented. Under the E1MN initiative, a comparison of VR participants with a Medicaid waiver with the overall waiver population indicates that Black/African American and Asian adults are underserved.

- There is a need for face-to-face services provided in American Sign Language or other signed languages along with appropriate assistive technology to meet the needs of deaf and hard of hearing individuals.
- The waiting list and Priority for Service categories may result in fewer American Indian individuals being served.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

In Minnesota, the statewide workforce system is known as CareerForce. The federal Workforce Innovation and Opportunity Act (WIOA) and state-funded employment programs collaborate to serve a diverse groupwide range of career-seekers. In particular, the Minnesota WIOA federal and state youth (student) programs serve a high percentage of young people with disabilities and have high rates of employment outcomes. The area of greatest opportunity is to increase the number of individuals with a disability using general Wagner Peyser career services, and their employment outcomes.

In the three WIOA Title I programs, Adult, Dislocated Worker and Youth, the percent of people served who have a disability increased in PY2023 from two years prior. Though percentage of people with a disability served through Title III Wagner-Peyser, the general CareerForce services, stayed the same, the number of people with disabilities served increased by about 250.

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. 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 IDEA.

Youth and The percentage of students are a growing percent of VR participants and youth under the age of 25 served in by VRS has increased since program year 2017. In addition to serving, a large group of students who are potentially eligible students. Extensive coordination occurs for VR services receive Pre-Employment Transition Services (Pre-ETS). As the youth VR service recipient population increases, service needs change.

The increasing need for services to students outpaces VRS capacity for service provision, resulting in significant unmet need for students. Some of the specific needs for students and youth with individual schools as well as the Minnesota Department of Education, under disabilities include:

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- Pre-ETS expenditures for high school students have greatly increased, across all service types. There is a memorandum of understanding and a branded initiative known as E1MN. Statewide, a large gap need to continue to provide these services to students in post-secondary completion exists for a new effective yet fiscally efficient manner.
- The waiting list and Priority for Service categories will result in fewer youth being served.
- High school students with a disability. Stakeholders identified the following underserved groups: serious mental illness receive fewer pre-ETS services.
- Students with the most significant disabilities, who need work experiences
- Students with mental health issues
- Students who are learning remotely and are harder to connect with
- Students who are in institutions (mental health or chemical dependency)
- Students who move frequently
- Individuals with a late diagnosis of Autism (after school age) who have limited supports
- Students with intellectual disabilities who don't have an IEP

Additional systemic needs or barriers were identified, including:

- Rural and suburban youth, in particular, struggle with transportation
- Families require need additional postsecondary education and support, including mental health support counseling opportunities.
- Need for more job coaching, especially evenings and weekends
- Need for more specialists trained in mental/behavioral health, chemical dependency, and learning disabilities.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

Vocational Rehabilitation Services has the following areas of capacity building with its community rehabilitation partners:

1. VRS purchases placement and retention services through a Performance Based Agreement (PBA) structure that was implemented in 2004. VRS has made several adjustments to the PBA structure to increase compensation to providers, however the overall rate amount of the PBA structure has remained the same since 2009. Due to inflation, including significant increases in cost of staffing and transportation, Community Rehabilitation Providers struggle to find highly skilled placement specialists at the current PBA rates. As VRS looks to increase the number of individuals served in Minnesota and reach underserved communities, it must review its current payment structure to build capacity of skilled placement professionals ready to connect jobseekers and employers.

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2. Another challenge is finding long term work site supports. VRS is a time limited service. VRS provides funding for job coaching services until the participant/employee no longer require intensive supports, however, long terms worksite supports, funded by Medicaid can continue indefinitely. Another workforce shortage challenge for Community Rehabilitation providers is the lack of staffing to support participant's ongoing worksite support needs. Funding is provided by Medicaid funding which is woefully inadequate to cover staffing costs. Unfortunately, the burden falls to the participant/employee/person and to VRS. VRS often continues to pay hourly job coaching hours to the community rehabilitation provider which is significantly higher than the Medicaid reimbursement rate.

3. There remains a great need to increase the resource of Benefit Planning (BP) to ensure the SSA beneficiaries in MN are aware of, including how to access, agencies in the MN BP network. In addition to the SSA beneficiaries, other support agencies, staff and the individual's family members often are not clear as to the local resources to help navigate the path of benefits. Lack of knowledge, or inaccurate shared information, can result in a negative situation of a possible overpayment and potential termination of benefits. Each benefit has its own set of rules which need to be followed to avoid negative or unplanned occurrence. Benefit planning helps identify the individual's specific benefit and what potential Work Incentives may be applicable for this person's situation. Transition aged students and their families often are not aware their work activities can have a potential impact on their SSA benefit. There is a need to engage students early in their receipt of SSA benefits and to re-engage often during their employment journey. A youth/student specific Work Incentive is often missed due to lack of awareness. As MN moves towards the elimination of sub-minimum wage, many will choose a competitive employment option and there are not enough BP Coaches/Planners to meet the need in assisting individuals identify how their benefits will be affected by earnings.

4. In general, families and other caregivers would benefit from additional education and support to assist them to navigate systems of care, including the MNChoices Assessment, waiver services, Medical Assistance, and other public benefits. To advocate for and with individuals with disabilities, support for caregivers should address potential barriers such as low income, unemployment, mental health, transportation, language, and citizenship status, in addition to managing the complexity of these benefit systems.

- VRS operates as the designated State unit in Minnesota. Due to circumstances within the State and consistent with the requirements of 34 C.F.R. § 361.29(a)(1)(ii), VRS has determined it necessary to engage in activities to establish, develop, or improve facilities for community rehabilitation programs (CRPs) (hereinafter "establishment projects") in the State for the purpose of providing vocational rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services to students with disabilities who are eligible or potentially eligible for the VR program. In assessing the need for establishment projects in the State, VRS has determined it may be necessary to incur capital expenditures to acquire equipment or improve field offices, which satisfy the definition of a CRP at 34 C.F.R. § 361.5(c)(7), in order to ensure the continuity of quality service delivery to individuals with disabilities seeking to receive services under the VR program. The State assures it will submit requests for prior written approval to RSA for those costs that exceed the capital expenditure threshold applicable to the State, or for any

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capital improvements necessary to ready the space for its intended use under the VR program, consistent with requirements set forth in 2 C.F.R. part 200.

5. ~~VRS plans to purchase and implement the use of virtual reality goggles in one location in each of three regions of the state for career exploration. This program would be led and supported by VRS staff, primarily staff serving Pre-ETS students, though the costs will not be charged to the Pre-employment transition reserve.~~

C. GOALS, PRIORITIES, AND STRATEGIES

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Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

VRS took into account all input from the SRC while developing its goals and priorities. ~~The SRC Chair was present at the first review of the goals and priorities with VRS leadership. Additional input was offered at SRC's September 2023 meeting, and the final draft was approved by the council at its December 7, 2023 meeting. The SRC Executive Committee members provided input during the development phase of goals and priorities at its October 16th meeting. The full SRC provided further input during its October 23rd meeting. At the request of the SRC, VRS will use stakeholder feedback as a continuous improvement tool to inform decisions, refine strategies, and strengthen service outcomes across all objectives listed below.~~

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

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A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. 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, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

The Objectives [outlined below](#) describe our goals, and the Key Results are definable outcomes [against which we measure our success on](#).

OBJECTIVE #1: PUBLIC AWARENESS – Minnesotans have a 0-1 scale clear understanding of the services VRS provides.

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Rationale: Minnesota is experiencing a growing number of youth and working-age adults with diagnosed disabilities, increasing the demand for Vocational Rehabilitation Services (VRS). To meet this need, it is essential that Minnesotans clearly understand what VRS offers and how to access services. Public awareness is not just about visibility—it's about clarity, trust, and connection. When individuals and businesses understand the value and impact of VRS, they are more likely to engage. Increasing awareness and knowledge of services VRS provides will help connect more Minnesotans with disabilities to employment.

Key Result 1: VRS has a higher percentage of online interest form submissions that result in completed applications to VR.

Supporting strategies:

OBJECTIVE #1: PUBLIC AWARENESS—Expanding awareness of VR and its services to both adults and youth from the wider population of Minnesotans with disabilities who could benefit from services.

- Rationale for inclusion in the State Plan: We want to increase outreach to create greater awareness and serve more people. We intend to use renewed resources to reverse the trend of decreased applications which was accelerated by COVID, and to effectively counteract the message of previously closed categories. Minnesota's VR program had been impacted by Order of Selection restrictions to varying degrees since 1998. In 2023, all categories were open for the first time in almost 25 years. Additionally, WIOA's intense focus on the most significant disabilities resulted in less focus on other categories. Beginning in 2016, staff capacity and attention was also drawn to addressing Section 511 and new Pre-ETS services which reduced program resources available for the wider population of Minnesotans with disabilities.

1994—Minnesota established its Order of Selection

1998—Category 4 closed

2002–2005—Categories 2 and 3 closed

January 2004—July 2005—Category 1 closed

2011—Categories 2 and 3 closed

2014—Waiting list cleared but Categories 2, 3 and 4 remain closed

2020—Categories 2 and 3 opened

2023—Category 4 opened

Key Result 1: VRS has increased the total number of applicants for services.

1. Provide clear, accessible information on all communications materials showing what VRS does and who receives services.

Supporting strategies:

- Research other state's rebranding strategies.
- Dedicate resources for targeted outreach.

- 6.2. Develop more ways for people to engage with improvements to the online interest form tool and process to help individuals easily connect to VRS services.

Key Result 2: VRS has an increased number of applicants from underserved youth and adult populations. businesses engaging with us.

Supporting strategies:

- Dedicate resources for targeted outreach to expand public awareness.
- 1. Highlight and share stories of successful VRS partnerships with businesses.
- 2. Promote trainings and resources like the bite-sized learning modules, CareerForce website, and other specific training for businesses to support their hiring needs.
- Increase the number of partner relationships collaboration among internal WIOA partners to promote greater awareness of VR program resources.

Key Result 3: VRS has an increased number of applicants from the fuller range of disabilities including disability populations who may not be familiar with VR services.

Supporting strategies:

- 5.3. Continue to gather data on Minnesotans connect with disabilities (500,000 people self-reporting/11% of population) to better understand and apply the information that's available and support businesses.

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- Dedicate resources for targeted outreach.
- Increase the number of partner relationships to promote greater awareness of VR program resources.

Key Result 4: **OBJECTIVE #2: PEOPLE – VRS has an increased number of applicants/participants interested in career advancement.**

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Supporting strategies:

- Review a **strong network of internal talent** and apply learning from other states' career advancement service models to benefit Minnesota.
- Shift the agency culture to one that moves beyond assisting participants in securing an initial job **external partners whose shared passion accelerates the delivery of seamless disability employment and embraces career-long independent living services.**
- Dedicate resources for targeted outreach to employers and previous participants.
- Develop career advancement services information and materials to share with both participants and employers.
- Develop career advancement service training for staff.
- Promote the new Employer Reasonable Accommodation Funds (ERAF) program and connections with business engagement services in VRS.

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OBJECTIVE #2: PEOPLE – Creating and sustaining a strong network of internal talent and external partners whose shared passion accelerates the delivery of seamless disability employment and independent living services.

- Rationale for inclusion in the State Plan:
 - Internal talent: Effective disability employment and independent living services require talented people - talent with special expertise, training, and experience to help people with disabilities achieve their competitive integrated employment hopes and dreams, and to help Minnesota prepare and employ a **nimbler and more nimble**, responsive workforce. In recent years, VRS has experienced increasing competition for high potential/high performing talent **and this. This** trend is likely to become even more challenging due to multiple factors including retirement demographics, fewer people entering **and remaining in** the VR field, and other competing career options. VRS needs to **continue to strengthen/maintain** its ability to recruit, develop and retain talent **and to better represent the full diversity of the communities we serve.**
 - External partners: Partners provide a critical extension of staff expertise and capacity to provide essential VR services and help VRS meet the federal requirement of providing access to quality services throughout the state. **Partners also enhance the diversity of populations and communities served with desired/needed services.**

Key Result 1: VRS talent is well positioned to deliver services by maintaining 90% or greater staffing capacity.

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Supporting strategies:

- ~~Increase targeted recruitment. Hiring will prioritize recruiting and retaining staff that represent the diversity of the individuals and communities VRS serves.~~
- 1. Continue to resource and fully utilize HR resources.
- ~~Continue to explore hiring and retention incentives.~~

Key Result 2: Develop a team of highly effective VR professionals to increase employment outcomes and results for youth (students) and adults.

Examples of supporting strategies:

2. Continue to enhance and standardize Provide an attractive work environment through flexible work schedules, recognition, and internal training

Key Result 2: VRS has a team of highly effective VR professionals that provide high quality services.

Supporting strategies:

- 1. talent Deliver robust VRS onboarding and mentoring programs.
- 2. Develop Provide resources and training to support ongoing staff development and ensure delivery of quality services, including mentor training/structure, based on a person-centered practice.
- 3. Review/analyze competencies for staff providing services, clarify Clarify expectations and create communicate performance expectations and success measures.

Key Result 3: Improved retention of VRS community partners provide high quality services to VR participants.

Supporting strategies:

1. talent Evaluate community partner contracted services to strengthen quality and fiscal standards.
2. Strengthen education for community partners to improve service delivery and ensure adherence to best represent the full diversity of the communities we contractual, fiscal, and procedural requirements.
3. Increase capacity and retain community partners.
4. Facilitate relationship building between VRS staff and community partners.
5. Foster a stronger collaboration with WIOA and One Stop partners in order to provide the most efficient services to a wide range of persons with disabilities in MN and easily connect them to needed services and resources. Collaborate with the WIOA Youth program as they continue to serve young people with disabilities, including a new grant focused on serving youth with more significant disabilities.

Key Result 4: Improved coordination with business partners.

Supporting strategies:

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- ~~Leverage the DEIA committee and consultants to identify strategies to enhance recruitment and retention.~~
- ~~Provide and promote leadership, career development, and advancement opportunities.~~
- ~~Develop and utilize stay surveys and exit surveys to learn more about reasons for staying or exiting the agency.~~
- 1. VRS Business Engagement staff will use Salesforce to document, track, and support business contacts across the state.
- 2. Coordinate employer engagement efforts internally with WIOA partners and external community rehabilitation partners.
- 3. Increase outreach and contacts to businesses that will support job seekers.

~~Key Result 4: Strengthen relationships with community partners to increase choice of providers and access to quality services.~~

Supporting strategies:

- ~~Recruit new community partners: Services that are culturally informed, affirming, and appropriate to the served individual's lived experience.~~
- ~~Increase capacity and retain Community Partners~~
- ~~Facilitate relationship building between VRS Staff and Community Partners.~~

~~Key Result 5: VRS has increased the number of businesses providing paid work experience and employment opportunities for VR participants.~~

Supporting strategies:

- 4. Position VRS as a trusted expert source of information and services on disability employment for businesses.
- 5. Develop ~~inclusive~~ worksite training and certification for employers.
- 6. Increase outreach and engagement with businesses to develop and grow our relationships with employers.
- 7. Frame our outreach to businesses on the benefits of employing people with disabilities.
- ~~Implement new resources such as ERAF to support employers.~~

OBJECTIVE #3: PROCESS - Customer-focused design drives improvement of our internal and workforce system processes.

- ~~Rationale for inclusion in the State Plan: Leveraging insights gained from multiple sources including the Minnesota State Rehabilitation Council as well as a recent VRS participant survey.~~ VRS is committed to simplifying what can be an overwhelming process for people seeking information and services from VRS and the broader workforce system. ~~Continuous improvement priorities include supporting staff in effective design and delivery of person-centered services, engaging employees to improve processes such as the VRS application to eligibility experience, updating~~

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technologies, and modernizing tools and resources to better engage and serve more people through a wide variety of options. VRS is always actively researching, exploring, and implementing ways to make a greater impact.

Key Result 1: Increase customer satisfactionImproved technology for stakeholders to connect with services.

Supporting strategies:

1. VR-Develop an online application process.
2. Improve interest form technology and processes.

Supporting strategies:

- Research and evaluate customer satisfaction approaches and techniques.
- 3. Develop a comprehensiveSolicit stakeholder review and feedback of outward-facing tech development.
- 4.4. Enhance participant feedback processopportunities to try assistive technology across the state.
- 5. Utilize technologies such as Salesforce to coordinate and provide services to business.

Key Result 2: Improved technology for internal processes to reduce administrative burden on staff

Supporting strategies:

Key Result 2: Improve process and customer experience through digital transformation.

Supporting strategies:

- 2.1. Evaluate and enhanceimplement improvements to the electroniconline interest form and rapid engagement workflow.
2. Utilize the WorkForce One case management system to maximize improvements that promote adherence to policy and guidance.
3. Explore use of AI.
4. Create a caseload management dashboard tool and train staff.
5. Implement the Introductory Career Services curriculum.
- 3.6. Explore, evaluate, and recommend VRS technology enhancements for internal and participant use.
- Prioritize and implement initial round of VRS technology enhancements.
7. Use Salesforce software to centralize and track business contacts.

Key Result 3Key Result 3: Streamline, strengthen, and share a statewide VRS school coordination process that ensures opportunity for students with disabilities.

Supporting strategies:

- Youth in Transition Toolkit (housed on Disability Hub MN), a set of resources for professionals serving students with disabilities

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- Implement Workforce One (WF1) student tracking system
- Maintain and support the VRS Youth Equity Workgroup (VYEW) to address the inequities in service provision and outcomes for students with disabilities
- Create a Youth Council or platform to illicit feedback from those who received VRS services while students

Key Result 4: Increased interagency coordination and alignment among the broad network of partners to create a 'no wrong door' approach for individuals or employers engaging in the workforce system.

Supporting strategies:

Supporting strategies:

1. Continue to manage and collaborate through effective ~~Memorandum~~ Memorandums of ~~Understandings~~ Understanding (MOUs) with key partners.
2. As a member of the GWDB, effectively engage and coordinate with required WIOA partners for one stop comprehensive job opportunity centers around the state.

~~OBJECTIVE #4: PERFORMANCE—Achieving the goal of more jobs for more people and meeting our federal requirements with fiscal integrity.~~

OBJECTIVE #4: PERFORMANCE - Provide high quality services to help individuals obtain and retain competitive integrated employment.

- Rationale ~~for inclusion in the State Plan:~~ As Minnesota's VR general agency, VRS is entrusted with federal funds to improve the lives of people with disabilities. Increasing performance outcomes is an important way we demonstrate the relevance of our program and the positive impact that results from federal funding. We know the numbers and statistics reflect our ability to meet the needs of real people and businesses around the state. Performance measures help VRS staff ~~and~~ and partners and stakeholders gauge our effectiveness in assisting people ~~with all types of abilities and career goals~~ to move forward with their career goals and to meet the needs of Minnesota's businesses. ~~To further enhance our performance, VRS is studying data on Minnesotans with disabilities to better understand where we can have greater impact as an agency and as part of the greater system to promote and expand opportunities for people with disabilities. Finally, the rigor and complexity of compliance with both state and federal fiscal requirements and grant programs requires the highest level of fiscal integrity to ensure the funds entrusted to VRS are fully utilized for the benefit of individuals with disabilities and communities throughout the state.~~

Key Result 1: Positive participant experience

Supporting strategies:

1. Assess and understand service provision needs as identified in the Comprehensive Statewide Needs Assessment.
2. Train staff to improve service delivery and experiences.
3. Learn from stakeholders who share feedback about their experience with VR.

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Key Result 2: Pre-ETS for potentially eligible students are available to students across the state.

Supporting strategies:

1. Continue partnership with schools for referrals and service provision.
2. Provide statewide online classes with consistent curriculum.
3. Establish initial student performance benchmarks.
4. Identify best practices and review for quality and continuous improvement.
5. Ensure staff are trained in delivering introductory Pre-ETS courses.

Key Result 3: Effective funds management based on customer data and participant trends for continued federal compliance and improved performance and federal compliance.

Supporting strategies:

1. Forecast expected spending levels for staffing and case services.
- Utilize funds not spent on case services for strategic projects designed to improve employment outcomes for people with disabilities.
2. Serve people on the waiting list as resources are available.

Key Result 2: Minnesota's moving towards becoming the national leader in the employment rate of people with disabilities.

Supporting strategies:

- Promote VR's role in employment for people with disabilities.
- Work with employers to create flexible job options customized for individuals with disabilities.

Key Result 3: Assess and understand disparities in service provision as identified in the Comprehensive Statewide Needs Assessment.

Supporting strategies:

- Train staff to recognize and understand implicit bias to reduce negative impacts on service delivery and experiences.
- Create mechanisms for applicants/students/participants/businesses to share feedback about their experience with VR and a platform to review and learn from that feedback.

Key Result 4: Improved effectiveness of Pre-ETS for potentially eligible and VR eligible students in order to increase successful employment outcomes.

Supporting strategies:

- Establish initial student performance benchmarks and identify best practices.
- Develop reports that are accessible to all staff for monitoring data quality and performance.

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- Implement a communication plan to review data with internal and external stakeholders.
- Provide annual staff training and ongoing support for analyzing data and reports.
- Evaluate effectiveness of service provision and address system-wide disparities.
- Purchase and implement the use of virtual reality goggles in one location in each of three regions of the state for career exploration. This program would be led and supported by VRS staff, primarily staff serving Pre-ETS students.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

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For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

GOAL 1: Provide quality services to youth (students) and adults with disabilities for exploration, development and advancement in careers.

Objective 1: Quality pre-employment transition services are provided to potentially eligible students

Key Results:

- Pre-ETS Representative data reports demonstrate that outreach is provided to every school district/charter school in Minnesota.
 - This data is not collected in our case management system. However, a list was developed and is updated twice yearly that identifies the lead special education teacher, the Pre-ETS Rehab Representative, and the Transition Counselor for every school in the state. This ensures continued collaboration and availability of Pre-ETS across the state.
 - VRS also added new positions to support this work with students:
 - * A Youth Services Manager was hired to oversee Pre-ETS and activities for students.
 - * Four Youth Specialists were hired to support the learning, mentoring and training of Pre-ETS Representatives and teams at a regional level. They have strong connections with the Department of Education, including at the state district and school levels to support the needs of students with disabilities.

served over the past year, and in PY22, 60.3% of all participants served by VRS were youth between the ages of 15 and 24.

- Participants are satisfied with the serves they receive
 - * Progress in developing a comprehensive satisfaction survey were interrupted by the pandemic. VRS will be continuing this work with our updated goals/priorities.
- Baseline is established and goals set for post-secondary education/training and obtainment of measurable skills gains
 - * VRS eliminated Consumer Financial Participation (CFP) and anticipates supporting more people in post-secondary education.
 - * MSG rates were negotiated with RSA
- A system for measuring career advancement is established and annual goals are established and met
 - * VRS is aware of this need, especially with focus in the past few years on other populations, such as youth and individuals on Medicaid waivers, and recognizes more work needs to be done in this area.
- Goals are established and met for statewide employment outcomes and job retention
 - * Goal setting was greatly impacted by the pandemic. While youth tend to have a lower rate of employment at exit, they have overall higher employment performance outcomes at Q2 and Q4 after exit. For PY2022, performance results for youth were 910 successful exits with employment, 59.9% employment in Q2 and 61.5% employment in Q4. For PY2021, performance results for youth were 960 successful exits with employment, 57.6% employment in Q2 and 54.0% employment in Q4.

GOAL 2: Strengthen business engagement.

Objective 1: Connect VRS participants to competitive integrated employment

Key Results:

- Develop and utilize tools to be able to search VRS's talent pool to efficiently connect VRS's job seekers to job opportunities
 - We reviewed and evaluated tools and will be implementing Salesforce software for the DIF grant CoMNI pilot in 2024.
- Build new employer relationships and prioritize nurturing long-standing employer relationships statewide. Leverage Business Engagement Networks and opportunities to assist businesses with increased hiring needs

- Business Engagement Networks continue to be the main way to connect our community partners and VRS staff to businesses who are interested in hiring people with disabilities.
- VRS added three Business Engagement Specialist positions to ensure statewide connectivity.
- Increased competitive integrated employment outcomes.
 - VRS focused on increasing the number of 245D licensed providers in our network of providers to coordinate services and provide consistent support to increase competitive integrated employment outcomes for people on Medicaid waivers.
 - VRS and the departments of Education and Human Services collaboratively developed the employment first (E1MN) framework, which spells out which agency pays for what and when.
 - In the past year, VRS has increased its Pre-ETS Representative capacity, which has allowed us to have students considering employment options at a younger age. Early exposure and experiences result in higher success moving into competitive integrated employment.

Objective 2: Connect students with disabilities to work experiences

Key Results:

- A mechanism for tracking work-based experiences is established and baseline data is collected
 - Workforce One, VRS' client management application, is the mechanism for tracking work-based experiences. In 2023, VRS created a new report for staff to track the hours remaining on authorized work experience services. This report saves staff time and reduces errors. Close to 1800 individuals received a work experience service in FFY22, up 500 from FFY21.
- Develop and facilitate a disability employment collaborative to meet the needs of businesses
 - A business advisory council was never developed, due to disruption by the pandemic.
- Competitive work-based learning opportunities for students with disabilities
 - There has been a shift over the past few years away from in-house/enclave employment. With very few exceptions based on individual need, all of VRS work-based learning placements are competitive.
- Increased awareness about the benefits of hiring people with disabilities
 - VRS, along with some business representatives from Mayo Health System, developed "Bite-size Learning" modules that feature the benefits of hiring people with disabilities.

- VRS is very active and engage businesses during National Disability Employment Awareness Month (NDEAM). In the most recent year, VRS and SSB hosted an event honoring 31 employers selected by VRS and SSB staff who are considered leaders by in employment of individuals with disabilities.

GOAL 3. Build a healthy organization in order to achieve our mission.

Objective 1: Fiscal stability

Key Results:

- Reduction in purchasing violations
 - Field Operations Specialists monitor the purchasing violations that occur in VRS. If an item or service has a cost, state agencies must first encumber (set aside) funds before entering into an agreement to purchase an item or a service. Common situations when an agreement to purchase occurs include: ordering goods, authorizing services, registering for training or conferences. Purchasing violations occur when an "Authorization/Work Order" is not completed prior to a service being performed.
 - Each time a violation occurs, staff must determine how the violation will be avoided in the future. There is also a statewide plan and recommendations on how to reduce purchasing violations, which will be implemented.
 - VRS has made significant progress in reducing the number of purchasing violations, 195 in CY2023, compared with 205 in CY2022 and 311 in 2019.
- Fiscal dashboards created and monitored to make decisions AND Actual spending reasonably tracks budgeted amounts
 - VRS has developed a new position for a director of financial forecasting and evaluation, hired in November 2023.
 - Financial reporting is being developed using financial statement activity to identify sources and uses of funds, spending trends and future needs to analyze projected surplus/shortfalls.
 - The leadership team plans to share and communicate financials with all staff.
 - A financial strategies workgroup meets bi-weekly to review the reporting and plan projected spending.
- Full 15% of Federal award is spend on Pre-ETS
 - VRS exceeded the 15% spending for Pre-ETS for FFY2023. We also have a stable plan to continue to meet the 15% requirement. Approximately 25% of the federal award was spent on qualifying pre-ETS expenditures during FFY2023.

Objective 2: Employee engagement

Key Results:

- ~~Staff burden is reduced through technology development~~
 - ~~There was a shift for all staff (n=422) to a hybrid work environment.~~
 - * ~~All staff now have a laptop bundle for portability.~~
 - * ~~All staff can work remotely and plug into a universal docking station in their primary work location.~~
 - * ~~iPhones — 393 total in rotation for staff~~
 - * ~~iPhone Replaced Project in Phase 1 — 104~~
 - * ~~iPhone Projected Replacement in Phase 2 — 142~~
 - * ~~144 Portable Printer and Scanners—support roles and transition counselors in schools have portable printer/scanners for working remotely.~~
 - ~~A mobile app for VRS' case management system was developed and released, available to staff and customers.~~
 - ~~Electronic signature functionality was built into the case management system.~~
 - ~~WF1 implemented the e-signature with AdobeSign for most common documents to give greater portability in obtaining signature from participants without having to print documents.~~
- ~~Staff are trained in conflict resolution~~
 - ~~All new staff are trained in Motivational Interviewing, which is a technique for conflict resolution.~~
 - ~~The DSA offered conflict management training to all staff.~~
 - ~~Courses are available in Yes LMS (learning management system) for conflict resolution:~~
 - * ~~Resolving Conflict, Creative Problem Solving,~~
 - * ~~Productive Disagreements—Leading Difficult Conversations,~~
 - * ~~Civility in the Workplace.~~

Objective 3: Build collaboration within VRS and across DEED

Key Results:

- ~~A project management tool (Monday.com) is used to track and report progress on projects to enable collaboration between units~~
 - ~~Monday.com was replaced with Microsoft Teams, which was rolled out to State staff statewide.~~
 - ~~VRS is also using Visio to create org charts and position tracking to aid with HR processes~~

Objective 4: Build human resource capital

Key Results:

- Plan developed to expand recruitment of qualified staff
 - VRS worked with HR partners to enhance hiring from 25% to 6% vacancy rate over the past year
 - Minimum qualifications for positions were reviewed and adjusted to recruit a broader candidate pool.
 - Job postings were reviewed and enhanced, including using plain language, to draw potential candidates.
 - Retention and recruiting bonuses were implemented.
 - A VRS DEIA committee was formed to play a pivotal role in creating culture that's more inclusive. This helps to recruit and retain more diverse staff at all levels of the organization. BIPOC hiring has increased
 - Efforts have been made to wider and targeted recruitment. This includes the use of the Handshake platform, which improves outreach and recruitment of staff at colleges/schools nationally
 - VRS implemented compensation for counselor interns.
- Counselors have effective and professional counseling skills
 - Motivational Interviewing training is required for all new staff
 - VRS began using YesLMS (learning management system) platform with lots of resources
 - We proactively promote external opportunities for professional development
 - VRS implemented a CRC budget increase for elective trainings
 - VRS expanded its minimum qualifications to include related fields in addition to VR
 - Managers are responsible and hold expectations for mentoring, monitoring and developing counseling skills
 - VRS is offering Transformational Leadership training for leaders, increasing capacity to support staff in counseling.
 - DEED and other areas combine to build manager capacity
- Counselors are proficient in aspects of disabilities for frequently served populations
 - VRS promotes available resources and training for staff on an ongoing basis. There is a wide range of topics available in the learning management system, YesLMS
 - VRS shares internal and external training opportunities with counselors

- VRS has staff specialists in areas of the largest populations we serve: Autism; Mental health, IDD
- There has been an increase in waiver services training.

GOAL 4. Strengthen collaboration through partner engagement.

Objective 1: Coordinate and align services

Key Results:

- Map of providers and services
 - VRS has attempted to create maps of providers and services, however, due to the increased complexities in service provision, we are exploring other ways to collect and maintain good provider information. VRS keeps a comprehensive list in SharePoint, which is available to staff.
- Referral and funding decision tree (who should pay for the service)
 - Under the E1MN initiative with the Departments of Education and Human Services, a process map was developed called the Engage, Plan, Find, Keep framework which clarifies roles and determines funding of services for those on Medicaid waivers.
 - The Disability Hub Work Toolkit has a section on Supporting People on Waivers that provides tools and resources to support understanding on the Engage, Plan, Find, Keep framework.
 - E1MN Training was launched in 2023 to support the E1MN referral and funding decisions for all roles.

Objective 2: Timely and relevant communication and training

Key Results:

- Fewer contract related inquiries and issues
 - VRS increased the size of its community partners team.
 - VRS launched monthly Partner Forums.
 - All communications to partners are sent via GovDelivery as well as posted to the website for community partners to easily find and access.
 - DSA Commissioner and Assistant Commissioner are actively interacting with local communities.
- More resources (FAQs, etc.) available to partners
 - A VRS Community Partners Committee with members from community partners across the state has provided strategic advisory to VRS on partner needs, issues and opportunities.
 - VR Community Learning Connections training series launched with LGBTQ+ series. The next topic will be on Unconscious Bias.

- ~~Partners are trained in delivering Pre-Employment Transition Services and report satisfaction~~
 - ~~Pre-ETS training has been developed for new and existing partners, as well as a "Guide on Pre-ETS."~~

Objective 3: Engage State Rehabilitation Council for input and feedback

Key Results:

- ~~Input and feedback provided to VRS leadership after each meeting for dissemination to VRS staff as needed~~
 - ~~The SRC coordinator, and VRS senior leaders attend all monthly SRC meetings, as well as other key staff, who are scheduled to deliver information and answer questions.~~
 - ~~The SRC chair presented and participated at the May 2023 Statewide VRS Managers Meeting.~~
- ~~VRS regularly reports back to the SRC on how the council's feedback is utilized~~
 - ~~All reports for which SRC input was requested, such as the CSNA and Combined State Plan, are shared with the council for final approval before disseminating or submitting to RSA.~~
 - ~~At the request of the council and as relevant, topics are revisited at subsequent meetings to provide updates.~~

OBJECTIVE #1: PUBLIC AWARENESS – Expanding awareness of VR and its services to both adults and youth from the wider population of Minnesotans with disabilities who could benefit from services. This goal has been modified due to implementation of Order of Selection.

Key Result 1: VRS has increased the total number of applicants for services.

- Progress: Applications to VRS increased from 5,514 in PY2022 to 6,682 in PY2023 and 6,113 in PY2024.

Key Result 2: VRS has an increased number of applicants from underserved youth and adult populations.

- Progress: Notable increases from PY2020 to PY2023 include the number of youth aged 18 and under who identify as Hispanic/Latino (138 to 249), Black/African American (140 to 253), and American Indian (65 to 106). The number of youth aged 19-21 who identify as Asian doubled from PY2022 to PY2024 (27 to 58).

Key Result 3: VRS has an increased number of applicants from the fuller range of disabilities including disability populations who may not be familiar with VR services.

- Progress: Increased number of applicants with primary ADHD (+303) and Specific Learning Disabilities (+239) from PY2020 to PY2023.

Key Result 4: VRS has an increased number of applicants/participants interested in career advancement.

Progress: VRS applied and did not receive a DIF grant to support this. We also experienced a 20% workforce reduction and have closed 3 of 4 categories.

OBJECTIVE #2: PEOPLE - Creating and sustaining a strong network of internal talent and external partners whose shared passion accelerates the delivery of seamless disability employment and independent living services. This goal will continue with modified strategies.

Key Result 1: VRS talent is well positioned to deliver services by maintaining 90% or greater staffing capacity.

- Progress: VRS maintains a healthy workforce retention rate (between 95% and 97%).

Key Result 2: Develop a team of highly effective VR professionals to increase employment outcomes and results for youth (students) and adults.

- Progress:
 - We enhanced and standardized VRS talent onboarding and mentoring programs.
 - We developed resources and training to support ongoing staff development and ensure delivery of quality services, including mentor training/structure, based on a person-centered practice.
 - We are reviewing/analyzing competencies for staff providing services, clarify expectations and create performance expectations and success measures.

Key Result 3: Improved retention of VRS talent to best represent the communities we serve.

- Progress: VRS has hired individuals with diverse skills and abilities to meet the needs of our participants. We have robust training opportunities for talent at all levels and have been intentional in offering a variety of leadership training opportunities designed for all levels of the organization and leadership experience, supporting staff career development and advancement. Staff also have access to tuition reimbursement for pursuing a Master's in Rehabilitation Counseling, as well as Individual Development Plans and goal setting embedded in the performance review process.

Key Result 4: Strengthen relationships with community partners to increase choice of providers and access to quality services.

- Progress: VRS hosts forums with our community partners, independent living centers, and VRS staff every other month. These forums provide an opportunity to share information, new initiatives, and changes with our partners and internal staff. VRS hosts annual regional meetings with our partners to allow for open dialogue and brainstorming between our organizations. VRS sends out regular updates via gov delivery to update our partners of changes and plans within the VR community. VRS has 200 community partners for individuals to choose from in Minnesota. This allows for choice and access in Minnesota.

Key Result 5: VRS has increased the number of businesses providing paid work experience and employment opportunities for VR participants.

- Progress: We have highlighted and shared employer stories, created and shared training for employers that includes bite-size learning training modules and a disability business partner training, and promoted the Employer Reasonable Accommodation Fund (ERAF)

to assist small/medium size businesses. We continue to do outreach and engagement with a wide variety of businesses and provide information on the benefits of hiring and retaining people with disabilities and connecting them with talented and highly qualified individuals.

OBJECTIVE #3: PROCESS - Customer-focused design drives improvement of our internal and workforce system processes. This goal will continue with modified strategies.

Key Result 1: Increase stakeholder satisfaction with VR processes.

- Progress: We have developed and implemented a comprehensive participant feedback process.

Key Result 2: Improve process and stakeholder experience through digital transformation.

- Progress: VRS continues to work on this key result. In the past program year, we have:
 - improved efficiencies in contract signatures and invoicing
 - Implemented an online interest form
 - Worked toward case management and reporting access for partners.

Key Result 3: Streamline, strengthen, and share a statewide VRS-school coordination process that ensures opportunity for students with disabilities.

- Progress:
 - VRS created quality assurance standards for Introductory Career Services (pre-employment transition services for potentially eligible students) and will train staff on these in the fall of 2025. These standards align with the person-centered principals outlined in the framework.
 - Piloted Workforce One (WF1) student tracking system, which allows school staff special WF1 access to see which students were referred to VRS, which of those students have applied, and where enrolled students are at in the VRS process.
 - Continued piloting “Discovering ME!”, a career development model out of Virginia Commonwealth University in partnership with several school districts. Are working with the Minnesota Department of Education to teach the model to more districts and support them in implementing it in the next school year.

Key Result 4: Increased interagency coordination and alignment among the broad network of partners to create a ‘no wrong door’ approach for individuals or employers engaging in the workforce system.

- Progress: The Designated State Agency (Department of Employment and Economic Development) continues this work. VRS meets regularly with CareerForce and other partners. VRS launched a successful online interest form that has generated increased referrals and easy access for referrals from partners, providers and others. VRS coordinates employer services and is piloting Salesforce software, which is used by our other WIOA partners to better coordinate employer services with our partners. In addition, VRS is a key contributor to a new DEED agency (DSA) goal focused on KR4. VRS is part of the Gov Workforce Development Board (GWDB) which is also working on this result.

OBJECTIVE #4: PERFORMANCE - Achieving the goal of more jobs for more people and meeting our federal requirements with fiscal integrity. A modified version of this goal and strategies will continue.

Key Result 1: Effective funds management based on participant data and trends for improved performance and federal compliance.

- Progress:
 - Use of dashboards to regularly monitor service authorization and spending trends with regular communication to leadership.
 - Changes to authorization procedures to reduce unused open encumbrances.

Key Result 2: Minnesota's moving towards becoming the national leader in the employment rate of people with disabilities.

- Progress: Minnesota continues to be in the top ten states in the nation based on U.S. Census data for Civilians with Disabilities Ages 18 to 64 Years Living in the Community. We work with employers to create flexible job options customized for individuals with disabilities.

Key Result 3: Assess and understand disparities in service provision as identified in the Comprehensive Statewide Needs Assessment.

- Progress:
 - VRS continually train staff to recognize and understand negative impacts on service delivery and experiences.
 - VRS created a mechanism for applicants/students/participants/businesses to share feedback about their experience with VR and a platform to review and learn from that feedback.
 - A quantitative feedback survey was done by the Minnesota Governor's Council on Developmental Disabilities.
 - A participant survey was created to capture feedback at various times throughout the VR process.

Key Result 4: Improved effectiveness of Pre-ETS for potentially eligible and VR eligible students in order to increase successful employment outcomes.

- Progress: Newly developed policy, guidance, and quality assurance standards have been created for Introductory Career Services (Pre-ETS to potentially eligible students) and Pre-ETS for students enrolled in the full VR program. Staff training began in the fall of 2025.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

Minnesota General and Blind agencies ~~combined met or exceeded all~~ achieved a high rate on the common performance measures for ~~PY2022- PY2024~~. The anticipated Overall State

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[Performance score is 97.8%, pending final adjustments by RSA using the Statistical Adjustment Model.](#)

Minnesota General contributed significantly to these successful outcomes by working with participants [to identify individualized goals](#) and employers to [identify and be hired into provide workers for](#) quality jobs that promote longer-term employment outcomes. Minnesota also monitored the MSG rate throughout the year and encouraged staff to collect all possible documentation prior to [PY2022PY2024](#) final reporting.

	PY2022PY2024 Actual	PY2022PY2024	DifferenceEstimated
Levels		Negotiated Levels	Performance
Employment (Second Quarter After Exit)	57.855.0%	51.558.0%	6.394.8%
Employment (Fourth Quarter After Exit)	57.855.4%	49.657.9%	8.295.7%
Median Earnings (Second Quarter After Exit)	\$3,723696	\$3,411850	\$ 31196.0%
Credential Attainment Rate	44.040.6%	31.044.5%	13.091.2%
Measurable Skill Gains	50.656.3%	50.37%	111.0.3%

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[3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES \(SECTIONS 101\(A\)\(18\) AND 101\(A\)\(23\) OF THE REHABILITATION ACT\) \(E.G., SRC, SILC\).](#)

Vocational Rehabilitation Services (VRS) operates as the designated State unit in Minnesota. Due to circumstances within the State and consistent with the requirements of 34 CFR 361.29(a)(1)(ii), [the name of the DSU] has determined it necessary to engage in activities to establish, develop, or improve facilities for community rehabilitation programs (CRPs) (hereinafter "establishment projects) in the State for the purpose of providing vocational rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services to students with disabilities who are eligible or potentially eligible for the VR program. In assessing the need for establishment projects in the State, Vocational Rehabilitation Services has determined it may be necessary to incur capital expenditures to acquire equipment or improve the field offices of VRS, which satisfy the definition of a CRP at 34 CFR 361.5(c)(8), in order to ensure the continuity of quality service delivery to individuals with disabilities seeking to receive services under the VR program. The State assures it will submit requests for prior written approval to RSA for those costs that exceed the capital expenditure threshold applicable to the State, or for any capital improvements necessary to ready the space for its intended use under the VR program, consistent with requirements set forth in 2 CFR part 200."

The needs of the SRC and SILC were fully funded.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

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1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

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~~(A)~~ Estimate of the number of persons to be served:

During Program Year ~~2024~~2026, about ~~500~~450 individuals will be served with Title VI, Part B funds supplemented by Title I funds. Under the administrative rule that sets forth Minnesota's priority-for-service categories, all persons receiving supported employment have three or more serious functional limitations.

~~(B)~~ The contribution of state funding:

Title VI B funds are used to provide supports after placement and before closure. Minnesota receives a state appropriation match for federal VR funding, which includes match for Title VI B funds. Additionally, the state legislature provides appropriations for three other programs that provide extended employment supports. The state-funded Extended Employment (EE) program that provides ongoing employment supports using state funding of \$~~18~~17.325 million annually that flows to community rehabilitation programs. More than 80 percent of this state funding provides extended services for persons in competitive integrated employment with supports. The Minnesota Extended Employment program serves all disability groups. An additional annual state appropriation of \$2,555,000 is dedicated to extended supported employment services for persons with serious mental illness ~~since it has been historically difficult to obtain ongoing support services for this population.~~ Another appropriation provides \$1,000,000 annually to provide long-term supported employment services for persons who are deaf, deaf blind or hard- of-hearing.

~~(C)~~ System complexity and limited capacity:

Funding for supported employment, within which Title VI Part B funds play a relatively small part, is governed by myriad federal and state laws and rules covering many categories of services. For example, a network of private, not-for-profit organizations, licensed by the Minnesota Department of Human Services Disability Services Division, provides day training and habilitation services that may include supported employment. People with mental illness may receive work-related support through the State Comprehensive Mental Health Act. In these instances, each county determines the level of service that will be provided. Title VI B supported employment funds are distributed on a fee-for-service basis under fee schedules developed with service providers. VRS collaborates with the Departments of Education and Human Services and county and local service providers to facilitate access to other funding and service resources. During development of a vocational rehabilitation employment plan, the vocational rehabilitation participant and the service team design a supported employment framework that

best meets the participant's needs. Planning for eventual long-term supports in the community is a crucial part of planning during VRS' time-limited period of service.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE 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; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

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VRS collaborates with MDE, DHS, and county and local service providers to offer statewide supported employment services. VRS is a partner in several state-level agreements that provide long-term supports. During development of an employment plan, VRS counselors and other service team members help consumers to select supported employment services that meet their needs. They identify which services will be provided by VRS, as well as the source of long-term supports in the community. VRS provides time-limited supports for up to 24 months, but an employment plan may be amended if additional time is needed to achieve job stability.

Transition from time limited supported employment services to extended services occurs when the individual:

- has completed time limited supported employment services on the individual plan for employment;
- has made substantial progress toward meeting the hours per week work goal established in the Supported Employment Plan; and
- is stable on the job.

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The primary funding resources for long-term supports in the community following VRS case closure are county case managers, the state Extended Employment Program, DHS Medicaid-waiver funded services, and the Social Security Administration's Impairment-Related Work Expense exclusions and Ticket to Work funding for persons on SSI and/or SSDI. When necessary, VRS funds extended services to youth with the most significant disabilities for a period not to exceed four years, or until such time that the youth reaches age 25 and no longer meets the definition of a youth with a disability, whichever occurs first.

In ~~FFY 2023~~Program Year 2024, Minnesota served ~~440~~about 2,400 individuals through supported employment services, spending approximately ~~\$660,000~~7.7M in title 1 or title VI funds. ~~35.42~~% of the individuals served were youth. In ~~FFY 2025~~Program Year 2026, Minnesota plans to serve ~~an increased~~stable number of ~~youth~~individuals through supported employment services ~~and a greater amount of expenditures overall~~. All persons receiving supported employment services will have three or more serious functional limitations (priority category one) and approximately half of the individuals will be youth with the most significant disabilities.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH

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WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

Under the designated state unit's strategic goal for effective partnerships, VRS seeks to expand its collaboration with other employment and disability services system partners to better coordinate and align services and assist business partners in ~~building inclusive workplaces and~~ developing best practices for recruitment and retention for individuals with disabilities requiring workplace supports.

VRS collaborates with MDE, DHS, and county and local service providers to offer statewide supported employment services for students, youth, and adults. VRS is a partner in several state level agreements that provide long-term supports. During development of an employment plan, VRS counselors and other service team members help consumers to select supported employment services that meet their needs. They identify which services will be provided by VRS, as well as the source of long-term supports in the community. VRS provides time-limited supports for up to 24 months, but an employment plan may be amended if additional time is needed to achieve job stability.

Transition from time-limited supported employment services to extended services occurs when the individual:

- has completed time-limited supported employment services on the individual plan for employment;
- has made substantial progress toward meeting the hours per week work goal established in the Supported Employment Plan; and
- is stable on the job.

State-funded Extended Employment Program:

Minnesota's Extended Employment Program, administered by VRS, provides ongoing employment support services for individuals to maintain and advance in employment. The program is funded by a state appropriation of ~~\$18,329 million~~ 17,325,000 per year. The direct services are delivered by a network of ~~2726~~ VRS Community Partners under performance-based contracts with VRS. These collaborations contribute significantly to the quality, scope, and effectiveness of the state's supported employment efforts. Minnesota General uses services provided through the program to youth with the most significant disabilities for state match purposes.

Individuals with Serious Mental Illness:

Minnesota VRS has been a leader in implementing the Evidence Based Practice of Supported Employment for persons with serious and persistent mental illness known as Individual Placement and Support (IPS). IPS receives ~~\$5,055,555,000~~ in dedicated state funding, which is used for grants to local partnerships of mental health programs and employment providers (Community Rehabilitation Programs). These funds provide ongoing supports to persons with serious mental illness who are receiving community mental health services. Minnesota's programs utilize the IPS fidelity scale (2008) to guide program development and implementation as well as program evaluation and outcome measurement.

Individuals who are Deaf or Hard-of-Hearing:

A dedicated state appropriation provides up to \$1,000,000 annually to provide long-term supported employment services for persons who are deaf, ~~deaf blind~~ or hard-of-hearing.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1	~~12,989~~ 11828	~~11,690~~ 11828	~~\$18,148,000~~ ~~\$19,953,040~~	~~0~~ N/A
2	~~1,714~~ 1596	~~1,470~~ 1014	~~\$1,308,992~~ ~~\$947,669~~	~~244~~ 582
3	~~635~~ 610	~~550~~ 254	~~\$498,926~~ \$236,896	~~84~~ 356
4	~~614~~ 5	~~452~~ 1	~~\$48,000~~ \$12,098	~~16~~ 24

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)

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B. SUPPORTED EMPLOYMENT PROGRAM.

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1	4,090,646	335,232	\$3,800,272,000	N/A

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G. ORDER OF SELECTION

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1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is implementing an order of selection with one or more priority categories closed.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

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A. THE JUSTIFICATION FOR THE ORDER

Annual State and Federal resources allocated for Minnesota's Vocational Rehabilitation Services program are not sufficient to serve all Minnesotans who are eligible for services. Conclusions regarding capacity of the Minnesota vocational rehabilitation program in any given year are based on:

1. An analysis of resources available for operation of the vocational rehabilitation program,
2. expenditures required to implement employment plans at the current rate of approval,

3. the anticipated costs for determining eligibility and priority for services of new applicants for the remainder of the fiscal year,
4. the anticipated costs of implementing approved vocational rehabilitation plans for eligible individuals during the fiscal year, and
5. reasonable and necessary costs related to administration of the vocational rehabilitation services program.

The budget forecast indicates a continuing trend toward increased costs while funding sources remain static.

Increases:

- Staff pay and benefits - staff under labor bargaining units ~~received higher than anticipated salary increases during the last round of negotiations and anticipate another increase in FFY25~~ receive negotiated annual salary increases
- ~~More eligible individuals~~ More eligible individuals – the number of individuals served ~~has continuously increased since~~ between 2020 and the implementation of the OOS.
- Cost of services – the average cost of services per participant has steadily increased, including tuition costs, equipment, supplies, technologies, provider fees, travel costs, etc.
- All operations costs: leases, contracts, indirect costs, technology;

VRS ~~has~~ implemented several cost-saving measures discussed with the SRC in addition to implementing OOS:

- Hiring freeze in place since Sept 2024 with limited exceptions as needed to ensure service availability statewide.
- Increased internal controls of case services and how we authorize for services
- VRS staff providing more direct placement and pre-ETS services where feasible rather than contracting all of those services out
- Review and decrease in operations costs: physical rental space, leased cars, outstate conferences, etc.
- ~~Reduction in staff hours (temporary or permanent)~~
- Retirement incentives offered April 2025
- Staff layoffs May 2025
- ~~Additional plans and solutions discussed with the SRC.~~

Forecasting indicates the savings from these measures is not adequate to address the projected shortfall. VRS ~~will close~~ closed categories 2-4 beginning April 7, 2025.

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

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Service Priority: The order of selection establishes service priority based on the number of functional areas in which a person has significant limitations to employment. Persons with limitations in more functional areas are deemed to have more significant disability. It is intended by the order of selection that persons with the most significant disabilities will be served first when all persons who are eligible cannot be served.

1. Priority Categories

- Priority Category One (first priority for service) includes all individuals with a most significant disability, that is, persons whose condition results in serious limitations in three or more functional areas.
- Priority Category Two (second priority for service) includes all individuals with a significant disability that results in serious functional limitations in two functional areas.
- Priority Category Three (third priority for service) includes all individuals with a significant disability that results in a serious functional limitation in one functional area.
- Priority Category Four (fourth priority for service) includes all other eligible [customers/individuals](#). These [customers/individuals](#) have a disability that makes them eligible for services, but they do not have a serious limitation in a functional area.

2. Functional Areas

Serious limitations in life skills in one or more of the following areas, as defined:

- Communication: the ability to effectively give and receive information through words or concepts, such as reading, writing, speaking, listening, sign language, or other adaptive methods
- Interpersonal skills: the ability to establish and maintain personal, family, and community relationships as it affects, or is likely to affect, job performance and security.
- Mobility: the physical and psychological ability to move about from place to place inside and outside the home, including travel to and from usual destinations in the community for activities of daily living, training, or work.
- Self-care: the skills needed to manage self or living environment, such as eating, toileting, grooming, dressing, money management, and management of special health or safety needs, including medication management, as they affect an individual's ability to participate in training or work—related activities.
- Self-direction: the ability to independently plan, initiate, organize, or carry out goal-directed activities or solve problems related to working.
- Work skills:
 - the ability to do specific tasks required to carry out job functions; and
 - the capacity to benefit from training in how to perform tasks required to carry out job functions.
- Work tolerance: the capacity or endurance to effectively and efficiently perform jobs requiring various levels of physical demands, psychological demands, or both.

3. Serious Limitation

- A serious limitation in a functional area means that, due to a severe physical or mental impairment, the individual's functional capacities in the specific area are restricted to the degree that they require services or accommodations not typically made for other individuals in order to prepare for, enter, engage in, or retain employment. Accommodations are defined as special working conditions, job re-engineering, rehabilitation technology, or substantial support and/or supervision.

4. List of Physical or Mental Disabilities

Physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, intellectual disabilities, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders including stroke and epilepsy, paraplegia, quadriplegia, and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease, or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility and priority for services to cause comparable serious functional limitation.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

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Per VRS guidance, individuals who are eligible for services put on the waiting list for services must be given information regarding other resources that may best be suited to address the specific employment needs of the individual. [Vocational Rehabilitation Services VRS](#) staff must provide the person with written notification of the referral which includes information and advice regarding the most suitable services to assist the individual to prepare for, secure, retain, advance in, or regain competitive integrated employment. The referral letter must include a specific contact within the agency to which the individual is being referred. Individuals on the waitlist are also given information about how to appeal a counselor's decision and contact information for the Client Assistance Program at: 1-800-292-4150.

Individuals will be taken off the waiting list in the order applications were received, starting with the category with the greatest number of functional limitations, Category 2, followed in order by Category 3 and finally with Category 4. Assignment into categories, based on the number of functional limitations identified, and date of application are managed in the case management system WorkForce One (WF1).

Opening categories is dependent on a number of budget factors, including cost of living increases in the award as well as increases in State Match funding and availability and award of reallotment funds. At the current trajectory of cost increases and flat funding, VRS does not foresee opening categories for the remainder of this Federal Fiscal Year.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

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Vocational Rehabilitation Services has elected to not exempt individuals who require specific services or equipment to maintain employment from the Order of Selection.

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

Not applicable

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

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

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

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

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Admin Director/Managers	4312	4612	4813

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Rehabilitation Area Managers	2423	2223	2523
Rehabilitation Specialists	3424	4424	4624
Rehabilitation Counselor	463149	468150	488160
Rehabilitation Representatives (Pre-ETS and Counselors-in-Training)	6214	6814	7614
Pre-ETS Representatives	20	20	20
Field Placement CoordinatorsStaff	2719	3419	3519
Vocational Rehabilitation Technician	7960	8460	9460
Administrative & Financial Support	448	428	438
Data Team Members	23	43	53
Other Field/Admin positions	54	54	64

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D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

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1:52 counselors to participants

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

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About 16,500 participants. As we serve more and more students, the total percentage of applicants completing a plan has been decreasing slightly. VRS has outlined strategies to address this trend in description (c)(A).

About 13,000 participants.

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

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A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND 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.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link to the blank table](#). You can copy and paste the table into the narrative field, and start over if needed.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
St. Cloud State University	MS Rehabilitation Counseling	25 first year students, 21 second year students14	1416
University of Wisconsin - Stout	MS Rehabilitation Counseling	1548	1511
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-	-	-	-

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B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY 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.

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Internships commonly lead to permanent counseling positions. The staff development ~~specialist~~ coordinator devotes approximately 5% time as the point of contact for managers, professors, interns, supervising counselors, and Human Resources to coordinate intern placement and supervision, and for counselor recruitment. Other activities include presentations to students and informing university personnel of counselor vacancies. VRS staff development is an active member of graduate counseling advisory committees at the University of Wisconsin - Stout and ~~St. Cloud State University and~~ communicates regularly with counseling program directors.

VRS provides tuition reimbursement for staff pursuing graduate degrees in rehabilitation counseling. Employees in the St. Cloud program and UW - Stout program ~~also have access to the RSA grant to assist with some tuition costs.~~ utilize the RSA grants when available.

~~VRS posts its vacancies at~~ Counselors and other staff are recruited and hired under Minnesota's competitive civil service system. VRS is also making efforts to enhance and increase our VR presence and service delivery to communities statewide for further recruitment. VRS posts its vacancies on the State of Minnesota personnel openings website, Handshake, LinkedIn, MinnesotaJobs.com, and sometimes on the Minnesota ~~counsel for nonprofits~~ Council of Nonprofits, RSA PIMS, Ramsey County Job Connect. We offer internal mobility and must follow union contracts to recall from layoff lists.

~~Minnesota post-retirement option: The post-retirement option, which permits a state retiree to work up to half time without losing insurance or retirement benefits, is a component of VRS retention and succession planning strategies.~~

As a key strategy for staff retention, VRS pays close attention to organizational vitality and staff morale. VRS works to maintain a high level of employee engagement through statewide staff

communication about the vision, mission, values, strategic goals and agency achievements, and a robust training and development program. Specific strategies that VRS uses to support employee engagement include: monthly virtual All-Staff Meetings, a DEI&A Committee, VRS Works and Director's Newsletter, and a variety of leadership opportunities, including the Emerging Leaders Institute and the Transformational Leadership Training. All-Staff Meetings are important to keep all employees engaged in what's happening around the agency, learn about updates, hear from leadership, connect with each other, and share best practices. VRS Works are listening sessions, available for any staff to participate in and intended to facilitate discussion around what's working, what needs improvement, and cultivate creative solutions targeted to specific areas of the work. In addition, DEED completed the Designated State Agency completes an Employee Engagement survey in early 2023 and it's complete yearly. Survey on a regular basis. The response rate for VRS employees was 72% this in the most recent administration of the survey in early 2023. Findings indicate strong employee engagement on the key indicators measured. For example, 88% of VRS employees agreed that they look forward to coming to work each day, 98% agreed that they understand how their role contributes to the mission of VRS, and 95% agreed that they are continually learning in their current role. Staff also provided suggestions for specific improvements at DEED that would increase their job satisfaction; response themes addressing caseload sizes for counselors, increasing salary/pay to be competitive, and hiring more staff in a timely manner. DEED plans to repeat the survey annually as a measure of employee engagement and as a tool to identify needed improvements in organizational effectiveness.

Counselors and other staff are recruited and hired under Minnesota's competitive civil service system, including affirmative action to recruit and hire individuals with disabilities and members of the state's diverse cultural and ethnic populations. Voluntary disclosure of ethnic and cultural status provides the following 2023 data: 1% of VRS employees identify themselves as American Indian/Alaska Native, 4% Asian, 4% Black/African American, 2% Hispanic/Latino, 84% identify themselves as White, and 6% are non-specified or undisclosed. At present, 24% of VRS employees voluntarily disclose a disability. The State of Minnesota aspires to be a leader in employing individuals with disabilities. As a key strategy, the State of Minnesota offers the Connect 700 program. Connect 700 allows eligible individuals with disabilities the opportunity to demonstrate their ability to perform a specific position for up to 700 hours on the job.

Dedicated staff in the metro area offer vocational rehabilitation services to refugees who recently immigrated to Minnesota from countries such as Somalia, Ethiopia, Jamaica, Turkey, Congo, Guyana, Iraq, Nigeria, Egypt, Pakistan, Sudan and Eritrea. The New Americans staff consists of a rehabilitation counselor and one placement coordinator. They are themselves refugees from East African countries. Each member of the New Americans staff is multi-lingual and provides intensive supports from application through employment closure to the VRS consumers they serve.

VRS is working on increasing vocational rehabilitation services to the Twin Cities American Indian community. This work is led by a counselor who is a White Earth Anishinaabe Band Member. This counselor has extensive knowledge in providing services to both youth and adults with disabilities will enhance on-going learning and service provision not only American Indian youth and adults but American Indian programs focused on training, career development and employment. This counselor also provides ongoing consultation with VRS teams, VRS staff and co-counseling as needed with American Indian participants and those interested in applying for vocational rehabilitation services. In addition, VRS is making efforts to enhance and increase our VR presence and service delivery to the tribal nations statewide. VRS managers and staff serving these communities attend the yearly Minnesota Tribal Nations training.

Coordination with professional associations: VRS staff serve on the board of the Minnesota Rehabilitation Association (MRA) and serve on MRA conference planning committees. A significant number of staff attend MRA conferences ~~each year~~. VRS encourages staff membership in professional associations, and many serve as officers and work on association committees.

[For more on recruitment, reference section \(d\)4 above.](#)

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. 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

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

The [VRS](#) Staff Development team coordinates training and develops training programs to meet needs, as identified through interviews with staff, reports from area managers, regional directors, subject matter experts, recommendations from staff groups and committees, [the State Rehabilitation Council](#) and consultations with the Executive Leadership Team (ELT). ~~QA~~[Quality Assurance](#) case review also yields training needs information. Staff Development and field managers meet regularly, as does the Policy Learning Team, to develop and guide staff development activity. In addition, the Staff Development and Quality Assurance Director is a member of the ELT. Training strategies can include 1:1 mentorship from agency subject matter experts, managers, and peers, on-demand and live courses in our learning management system, ~~all~~-staff meetings, quality assurance case reviews on individual case work, and policy transmittals. The Policy Learning Team is focused on increasing appropriate application and compliance with VRS policy and guidance through ongoing development and implementation of effective learning strategies, tools and dissemination. The team membership is made up staff who hold various roles throughout the agency and serve different areas of the state, bringing their ~~diverse~~ perspectives to training. The training is brought to leadership and managers first, then cascades out to staff. Quality Assurance work connects to these training topics and is a part of the strategic learning loop, and at times follow up with additional training.

New VRS employees are provided a robust onboarding training program, covering topics related to their unique role, ~~agency culture~~, mission, and values. Required courses that are offered in a live virtual or in-person format include: VRS New Employee Orientation, Data Practices, Ethics, Person Centered Foundations, ~~Cultural Awareness~~, Mental Health First Aid, Case Note Fundamentals, ~~Transition 101~~, Introduction to Motivational Interviewing, and Purchasing Policies and Procedures. In addition to live courses, new employee onboarding includes training from the mentorship team, where they learn ~~hands on~~ the core components of their job ~~hands-on~~. The mentorship team is led by the hiring manager and includes a peer mentor and subject matter expert. To supplement the learning from the mentorship team, there is also on-demand ~~course work~~[coursework](#) in our learning management system

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(YesLMS). There are currently ~~100 courses~~277courses in YesLMS. Courses in YesLMS that new employees are required to take include: Employment Plan, Assessment of VR Needs, Closures and Exit Reasons, Informed Choice, Supported Employment, Data Security, Mandated Reporting, Violence and Disruptive Behavior Policy, and Pre-ETS Modules. Additional examples of courses available if needed for their individual development include: Medical Aspects of Disability, ~~Intersecting Identities, Power, Privilege, and Implications for VR,~~ History of Vocational Rehabilitation, Negotiation Skills for Employer Engagement, ~~Disability Language and Etiquette,~~ and an Overview of the ADA, ~~Small Business Services, Strategies to Identify Employer Needs~~ 101. Career Counseling 101: Best Practices, Work and Benefits Series.

VRS offers tuition reimbursement for employees obtaining a graduate degree, certification program, or series of courses, as long as the coursework ties directly to the business and programmatic needs of VRS.

Staff are encouraged to participate in leadership opportunities. VRS ~~supports~~has supported the ~~DEED~~State of Minnesota Emerging Leadership Institute and the Senior Leadership Institute. ~~Currently, VRS is supporting all managers and some specialists to attend the~~ Transformational Leadership Training. In addition to formal leadership programs, staff have opportunities to lead as peer mentors, participate in agency wide committees, co-lead staff training, act in liaison roles, and share best practices at all staff meetings.

In addition, annual performance reviews between supervisor and employee include a review of training and development needs of the employee. ~~Every employee is required to develop and~~ This includes the development of an Individual Development Plan to assist in acquiring new knowledge, skills, and abilities on the job. Each employee is expected to attend a minimum of one elective continuing education program per year. ~~VRS covers the cost of elective continuing education for staff, up to \$500 per fiscal year.~~

~~Looking forward,~~VRS ~~plans to further enhance the current~~continuously enhances training and development opportunities. VRS will ~~take the first steps towards~~continue building a ~~robust~~ counseling curriculum so counselors will have access to fundamental counseling skills practice to advanced level skills practice. ~~VRS also plans to have on-going continuous improvement to the onboarding process and training, with initial focuses on enhancing our peer mentorship and training curriculum. A specific topic area of focus is career advancement for our customers.~~VRS also plans to ~~continue to~~ offer statewide opportunities for teams to come together ~~for team building, learn about to apply~~ their ~~individual strengths, the strengths of the team, and how they can best~~learning to their work ~~together through discussions and activities following formal training.~~ VRS ~~also plans to~~will continue to explore VR leadership training opportunities for staff at all levels.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY 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

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION

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ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

Vocational rehabilitation counselors and other professional staff are hired through competitive process under the Minnesota civil service system.

Rehabilitation Counselors

- Master's degree in Rehabilitation Counseling, Counseling, Human Services, Sociology, Education, Social Work, Psychology, or other closely related field
- All of the agency's vocational rehabilitation counselors meet the state's standard.

Rehabilitation Representative

- Bachelor's degree in Rehabilitation Counseling, Counseling, Human Services, Sociology, Education, Social Work, Psychology, or other closely related field

Placement Coordinator

- One year [of](#) professional experience in which the primary focus was the provision of vocational services to persons with disabilities; or
- Bachelor's degree in [Behavioral Science](#)[behavioral science](#), Counseling, Vocational Evaluation, Job Placement, Vocational Rehabilitation, Education, Human Services, or a closely related degree; or
- Three years of paraprofessional experience in which the primary focus was the provision of vocational services to persons with disabilities. A [Bachelor's](#)[bachelor's](#) degree substitutes for half of the experience requirement.

Vocational Rehabilitation Technician

- Software applications such as Microsoft Office Suite to manage, track, and report expenses, financial transactions, and invoices
- Basic accounting sufficient to review, analyze, and verify financial records, calculate monthly fees, and prepare financial summaries and reports
- Math (arithmetic) sufficient to add, subtract, multiply, and divide whole numbers, fractions, decimals; and calculate percentages
- Keyboarding to enter data in a database or spreadsheet comparable to the State's accounting system (SWIFT) and Workforce One platforms
- Communication to provide prompt, courteous, and accurate information to coworkers and all stakeholders
- Human relations to negotiate, collaborate, build, and maintain positive working relationships with coworkers, jobseekers, and vendors

Pre-ETS Representative

- Bachelor's degree in Rehabilitation Counseling, Counseling, Human Services, Sociology, Education, Social Work, Psychology, or other closely related field or,

- High school diploma/GED and one year experience working with students with disabilities related to employment services in one or more of the following areas: job exploration counseling, work-based learning, counseling on post-secondary options, workplace readiness training, and/or instruction in self-advocacy.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL 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.

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VRS ensures that personnel and methods are available so that staff may communicate with individuals in a preferred language or other means of communication. Substantial numbers of VRS ~~customers/stakeholders~~ use languages other than English, including Cambodian, Lao, Vietnamese, Somali, Spanish, and American Sign Language. ~~Translation of forms, information brochures and the availability of purchased~~ Utilizing interpreter services ~~or a~~, multilingual staff ~~member-members, translation of forms and information brochures~~ ensures effective communication statewide.

Deaf and Hard of Hearing services are provided by highly qualified VRS staff including one State Coordinator for Deaf Services (who is also in a dual role as ~~a~~ Manager) and ~~24~~11 staff who are conversationally fluent in American Sign Language. We have two Regional Directors, two VRS managers/supervisors, eight counselors, ~~one~~two placement ~~specialist, three~~specialists, ~~two~~ VR technicians, ~~two~~one Rehabilitation ~~Representatives~~Representative, an Office and Administrative Specialist, and two Occupational Communication Specialists (who are also certified sign language interpreters). Counselors and staff are using a variety of video options such as Zoom, MS Teams, Google Meets, videophones, FaceTime and texting to communicate with people and providers who use our services. Staff can use video remote interpreting by requesting them through interpreter referral agencies on the state master contract and then incorporating their services virtually through the participant's chosen platform. Counselors ~~are also using videophones, FaceTime, Microsoft Teams, Google Meets and texting to communicate with people and providers who use our~~purchase captioning services ~~through the state master contract or through Automated Speech Recognition software available via some of the video platforms~~.

5. 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.

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VRS provides ~~personnel development for staff no less than one time annually~~training on ~~the topics of~~ Understanding the Special Education Evaluation Report and IEP Basics for staff working with students in accordance with the Individuals with Disabilities Education Act (IDEA). The training is available to ~~Transition~~Counselors ~~serving students~~ and ~~Pre-ETS~~Introductory Career Services Representatives, though the focus is on building knowledge and understanding of IDEA for counselors with students who are VRS participants with full services. During the training sessions, IDEA provisions of Free Appropriate Public Education ~~9FAPE~~(FAPE), Appropriate Evaluation for a student with a disability, the Individualized Education Program, Least Restrictive Environment (LRE), Parent/Guardian and Student Participation in the IEP Process and Decision-Making and the requirement of Procedural Safeguard are addressed. Notably in Minnesota, the legislature recently increased the age ~~eof~~ of students who are eligible for FAPE under IDEA from 21 years old to students up to 22 years old. This change was significant for students with disabilities in schools. ~~In order to~~To ensure that our staff were prepared to participate as part of the IEP team, we provided them with the

knowledge and guidance from the Minnesota Department of Education and information regarding this change in August of 2023.

J. COORDINATION WITH EDUCATION OFFICIALS.

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In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

DEED-VRS and SSB are partners with the Minnesota Departments of Education (MDE) and Human Services (DHS) in the Employment First Minnesota (E1MN) effort. E1MN works toward a seamless system of employment services and supports being available to all persons with disabilities, including students. State-level leadership and staff meet regularly to plan for training, technical assistance, resource development, and problem-solving related to collaboratively serving students and adults with disabilities. E1MN efforts are focused on [eliminating barriers for accessing coordinating](#) services and supports needed to prepare for, find, keep, and advance in competitive integrated employment.

[This year](#)[In 2023](#), E1MN partners created a Minnesota Transition Framework which defines high-quality transition programming, and a Youth in Transition Toolkit (housed on the Disability Hub MN website) which supports the framework. The toolkit is a one-stop shop for professionals to learn about the Transition Framework, understand the basics for transition programming (i.e., laws, roles, agency plans, and policies), and get resources and tools to serve youth/students and families.

[Furthermore, E1MN is planning for a new structure for regional work between the three agencies and local professionals that provide transition services to students with disabilities, which will launch in early 2024. The goal is to invite all school, VR, waiver, and employment service provider staff in each region to learn about the Minnesota Transition Framework and Youth in Transition Toolkit, to assess where they are at with transition programming, and create plans for improvement. State staff will provide training and technical assistance to teams as they implement their plans.](#)

[VR transition services assist eligible youth to plan for and make the transition from secondary school to competitive integrated employment.](#) Throughout the State of Minnesota, we are committed to providing students with disabilities Pre-ETS to meet their needs. [VR transition services assist eligible youth to plan for and make the transition from secondary school to competitive integrated employment.](#) Ultimately, VRS assists students in choosing a post high school employment goal and ensures that they receive the services needed to reach that goal. [Each school is VRS Transition Counselors are assigned a Counselor and a Pre-ETS Representative who work in collaboration with school staff to provide services to students with disabilities, each school throughout the state.](#) Some of the ways that VR staff support the needs of students include, attending IEP meetings, providing group services and instruction to prepare for employment, arranging work experiences or job [try-outs](#)[tryouts](#) for students, and any activity that aligns with the Pre-ETS categories below that will meet the need of a student and fill in the gaps of what the school is unable to provide.

As a part of these efforts, any of the 5 Pre-ETS [are available](#) to students who are potentially eligible [\(served by Pre-ETS Representatives\)](#) and eligible for VR [\(served by VR counselors\)-services:](#)

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Workplace readiness training
- Instruction in self-advocacy

Additionally, as needs arise throughout the State, the E1MN Team works together with the Minnesota Department of Education to address changes on the policy level and down to the school level to meet the needs of students with disabilities. Specifically, we meet regularly with school districts who are struggling to engage with VR Services to develop a better system of coordination for overall service provision. The results of these meetings include improved student engagement in VRS.

2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

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

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

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E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

DEED-VRS and State Services for the Blind (SSB) have a Memorandum of Understanding (MOU) in place with the Minnesota Department of Education (MDE), which was signed in June 2020. This MOU outlines all topics required in 34 CFR 361.22(b). As was noted in the section prior, E1MN is the initiative that brings our agencies together, along with the Department of Human Services (DHS- the state's Medicaid agency) to plan and support for a seamless system of employment services and supports for students, youth, and adults with disabilities. The E1MN effort (which includes the Minnesota Transition Framework, Youth in Transition Toolkit (YITT), and E1MN regional structure) is also the means by which the MOU is put into action.

Specifically, topics within the MOU are being addressed as follows:

- Consultation and technical assistance: The E1MN regional effort will be a venue for “teams” (consisting of school, VR, county, and provider staff) to plan for system improvement and identify/request the technical assistance needs they have.
- Transition planning: One “shared practice” within the Transition Framework describes the “Youth Planning Process” and what steps should be taken by all partners in creating and implementing Individualized Education Programs (IEPs) and other agency plans. This will be emphasized in the E1MN regional work.
- Roles and responsibilities, including financial responsibilities, of each agency: The YITT has a section that reviews roles and responsibilities. ~~This will be a central focus of the kickoff of the E1MN meetings.~~
- Procedures for outreach to and identification of students: The YITT, VRS outreach materials, VRS website, and school training presentations make clear that VRS can serve students ~~age~~ 14 and older and that early referrals are encouraged. It is rare, but VRS has also served students younger than age 14. VRS has ~~two staff~~ a Transition Counselor assigned to every high school and 18 to 22 transition program in the state, and it is the expectation that these staff meet with all possible school referring staff to explain VRS services, how to make a referral, and how school and VRS can best collaborate in serving students. When referrals are made, VRS staff meet with students and parents/guardians (as applicable) to explain services and eligibility, provide an application packet, and discuss what next steps would be. Staff also do outreach in other creative ways such as attending school or community events, connecting with other youth-serving organizations, and more.
- Coordination with schools ~~related to~~ documentation requirements related to subminimum wage employment: In the spirit of E1MN, VRS works with schools to message to students and families the expectation that all students with disabilities can

achieve goals for competitive integrated employment. In the cases where a student and parents/guardians (as appropriate) have indicated a desire to pursue subminimum wage employment, VRS works with the student and their “team” (typically their IEP team) to review the documentation requirements. VRS has materials and a webpage to share with all parties that explains the process.

- Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage: Minnesota schools that have MDE approved work-based learning programs must sign an assurance that they will follow, among other things, 34 CFR 397.31 (i.e. will not contract for nor support subminimum wage work experiences).

K. COORDINATION WITH EMPLOYERS

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In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

Work-based learning experience (WBLE) for students with disabilities is the top pre-employment transition service that VRS provides. These experiences are coordinated with employers through internal placement coordinators ~~and~~ placement specialists and external contracted Pre-ETS providers. ~~In both cases,~~ VR counselors (serving students who are eligible for VR) ~~or Pre-ETS representatives (serving students who are potentially eligible for VR)~~ will ~~refer a student to the internal or external staff,~~ coordinate a meeting ~~is held together~~ with the student (and parent/guardian and other student supporters such as school as applicable) to talk through the needs and interests of the student related to the WBLE, ~~and then the~~ An internal or external provider will then take the lead in developing and supporting the WBLE ~~(with VR counselors and Pre-ETS Reps,~~ counselor checking in and monitoring progress). Internal ~~and/or~~ external placement ~~and Pre-ETS staff,~~ providers have many ways in which they work closely with employers to make WBLEs happen. Many have developed relationships with employers in the community and know those who are willing and able to support WBLEs. In cases where an employer relationship does not exist, they reach out to develop them. Furthermore, Business Engagement Networks (BENs) are another forum where placement and Pre-ETS providers come together as partners to share information about employer relationships ~~in order to assist in job placements and Pre-ETS WBLEs. Finally, VRS co-leads three regional Pre-ETS Communities of Practice (CoP) with our contracted provider community. These are monthly meetings between VRS counselors, Pre-ETS representatives, and placement staff and external contracted Pre-ETS providers. The mission of the Pre-ETS CoPs is to build relationships and a shared understanding of Pre-ETS. During these meetings best practices in developing Pre-ETS opportunities, such as WBLEs with employers, are also discussed to assist in job placements and Pre-ETS WBLEs.~~

Excellence in job placement and retention services is fundamental to more fully living into DEED’s vision statement of “a healthy economy, where all Minnesotans have or are on a path to meaningful employment and a family sustaining wage, and employers are able to fill their ‘in demand’ jobs.” Coordination with employers is also key to VRS’ priority to embrace employers

as key ~~customers~~stakeholders resulting in increased employment outcomes. This is accomplished in the following ways:

- ~~Implementing and refining~~VRS has implemented a VR client talent pool structural framework within the electronic case management system. The talent pool ~~will be developed~~allows VRS to gather and tap information to facilitate matching VRS clients to employment opportunities. ~~VRS will secure approval and resources to develop the client talent pool structural framework as part of a larger rewrite of the case management system. Minnesota's electronic case management system has capacity to identify talent pool.~~ VRS staff input key talent pool identification data which greatly enhances the ability for Placement staff to identify pools of candidates based on employer needs. VRS staff ~~will~~ benefit from training to correctly utilize the talent pool refinement tools available in WF1. ~~DEED-VRS is currently piloting Salesforce as a part of the Disability Innovation Grant demonstration project as a way to track employer engagement. This pilot will allow VRS to see if Salesforce might meet our greater need to track our engagement with businesses.~~
- ~~Developing and implementing low risk Hiring and retention options designed to increase employment outcomes and workforce diversity.~~ DEED-VRS ~~updated is currently piloting Salesforce as a part of the process, policies guidance and definitions for an array of Disability Innovation Fund Grant demonstration project to track employer engagement. This pilot will allow VRS to see if Salesforce might meet our greater need to track our engagement with businesses.~~
- VRS offers low risk hiring and retention options ~~which designed to increase employment outcomes. These~~ are referred to as On-the-Job Work & Training Options ~~in Policy and Guidance Manuals. This information, along with the Connect 700 hiring initiative was shared with Community Rehabilitation Partners through statewide training to ensure consistency of understanding and application.~~
- ~~Leading~~VRS Leads and ~~convening~~convenes Business Engagement Networks (BEN's) focused on meeting the needs of business by providing a talent pool of candidates that can meet the needs of business utilizing a Single Point of Contact (SPOC) coordinated approach with VRS, Community Rehabilitation Providers, and Special Education Work Coordinators. WIOA Common Performance Measure 6 (effectiveness in serving employers) will be developed and addressed in an annual report. Following is a report of progress on the revised priorities:
 - Minnesota VRS ~~supported~~supports BENs throughout the state ~~to provide and encourages~~ a Single Point of Contact (SPOC) ~~as a best practice~~ to meet the needs of business and to enhance the skills of placement professionals. ~~continue~~
 - VRS ~~continues~~ to reflect the needs of business representing the local areas of Minnesota including urban, metro and greater (rural) areas of the state as well as provide ~~joint~~relevant training to maintain qualified staff.
 - BEN's also share job leads and plan events that connect job seekers to Business like tours, job fairs, and other opportunities to for placement staff to meet with local businesses.

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- ~~Disability Inclusion~~ VRS placement and business engagement staff are available to consult and offer trainings to employers. Tools developed by VRS include the Business Partner training that is currently being built, and the Bite-Sized Learning Modules are resources for employers that takes a topic and breaks it into short modules that can be presented in about 20 minutes. Each module features a video, the PowerPoint presentation used in the video and a takeaway card to reinforce learning and provide links to additional resources. There are 5 current modules on DEED's CareerForce website on the following topics:

17-○ Module 1: Defining Disability and the Americans with Disabilities Act

18-○ Module 2: Recognizing and Implementing a Request for Reasonable Accommodations

19-○ Module 3-: Self ID: Building a More Inclusive Culture

20-○ Module 4: Inclusive Communication

21-○ Module 5-: Mental Health Matters: Let's Talk

- Both internal and external placement ~~and Pre-ETS~~ staff have many ways in which they work closely with employers to coordinate services. Many have developed relationships with employers in the community and know those who are willing and able to support students with disabilities. In cases where an employer relationship does not exist, they reach out to develop them. Furthermore, Business Engagement Networks (BENs) are another forum where placement and Pre-ETS providers come together as partners to share information about employer relationships ~~in order~~ to assist in job placements ~~and Pre-ETS WBLEs~~.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

~~The Minnesota STAR (System of Technology to Achieve Results) Program: The STAR Program, a program within the Minnesota Department of Administration, is funded by the Department of Health and Human Services in accordance with the Assistive Technology Act of 1998, as amended. Vocational Rehabilitation often refers people to STAR for a device demonstration. This allows consumers to compare benefits and features of a particular device or category of devices. Once a decision on a device is made, the person can borrow the device for 45 days to make sure it meets their needs before VR purchases the item. VR also maintains an agreement with STAR to provide VR assistive technology specialists with commonly used devices for use in doing assessments with consumers.~~

VRS ensures that 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 through a rehabilitation Assistive Technology (A/T) Specialist. The VRS A/T Specialist provides

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onsite assistive technology assistance to staff and consumers. They also coordinate with the Minnesota Department of Education (MDE) to promote inclusion of assistive technology in Special Education services and transition plans. The A/T specialist is supported by one local Assistive Technology (AT) liaison on each VR team across the state. ~~Placement coordinators offer assistance to employers in using rehabilitation technology to resolve employment barriers. Placement Coordinator~~ Placement Coordinators connect with the VRS A/T Liaison or Specialist to ensure the employer receives the information and technology they require to ~~remove employment barriers~~ support career access for their employee. The VRS website has an assistive technology page with links to nationally recognized websites. ~~VRS coordinates closely with the STAR Program which operates an equipment loan program that allows consumers to try the assistive technology for 30 days before VRS purchases the equipment.~~

VRS coordinates closely with the Minnesota STAR (System of Technology to Achieve Results) Program. The STAR Program, a program within the Minnesota Department of Administration, is funded by the Department of Health and Human Services in accordance with the Assistive Technology Act of 1998, as amended. Vocational Rehabilitation often refers people to STAR for a device demonstration. This allows consumers to compare benefits and features of a particular device or category of devices. Once a decision on a device is made, the person can borrow the device for 45 days to make sure it meets their needs before VR purchases the item. VR also maintains an agreement with STAR to provide VR assistive technology specialists with commonly used devices for use in doing assessments with consumers.

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

There currently is no formalized working relationship between the Department of Agriculture and Vocational Rehabilitation Services. The Minnesota USDA Rural Development Office does use technical economic and forecasting information provided by DEED to develop and market its services.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

As two critical CareerForce partners, DEED-VRS and Workforce Development Areas (WDAs)/WIOA Title I programs (which are mandated to expend 75% of their federal funds on out-of-school youth) come together on the local and regional level to ensure needs of out-of-school youth are met. Cross referrals and dual enrollment ~~happens~~ happen as appropriate. Additionally, six of the sixteen Minnesota WDAs have a professional and technical contract with DEED-VRS to provide Pre-Employment Transition Services. Although these services are for in-school students, the benefit of this partnership ensures that if/when students are no longer in school, these youth can continue services through WIOA Title I and VR collaboratively as appropriate.

4. STATE USE CONTRACTING PROGRAMS;

Since the mid-1990s, Minnesota state agencies have been legislatively encouraged to purchase goods and services from small businesses operated by individuals with disabilities. In 2007, the Legislature enacted a set-aside program, providing that 19 percent of the total value of all state janitorial contracts be awarded to community rehabilitation organizations approved by VRS as service providers under the VRS Extended Employment Program. During the 2010 legislative session, the set-aside program was expanded to include document imaging, document shredding, mailing, collating, and sorting services. Further, the amount of each contract awarded under this section may exceed the estimated fair market price for the same goods and services by up to 6 percent.

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5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

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The State Medicaid plan under Title XIX of the Social Security Act; Medical Assistance, the state's Medicaid program, is administered by the Department of Human Services (DHS) Disability Services Division (DHS-DSD). Vocational Rehabilitation Services (VRS) and State Services for the Blind (SSB) collaborate closely with DHS in the provision of services for individuals who are on home and community-based waivers. In September 2019, DHS-DSD, VRS, and SSB signed a Memorandum of Understanding. The terms of the MOU are specific to individuals on a Medicaid waiver who are interested in competitive, integrated employment. Employment First and Person-Centered principles form the basis of the shared vision for how DEED-VRS/SSB and the Medicaid agency agree to provide employment services for people with disabilities in a coordinated manner. The purpose of the MOU and interagency cooperation is to align systems so that common ~~customers~~[participants](#) – those who receive home and community-based service disability waivers and vocational rehabilitation services from VRS or SSB – can get seamless and timely supports to make informed choices and meet their competitive integrated employment goals. Implementation of the MOU agreements began July 1, 2021. DEED-VRS/SSB and the Medicaid agency have developed communication, stakeholder involvement, training and resources to ensure understanding of the responsibilities for each party supporting the person on a Medicaid waiver.

Under the MOU, the following coordination of services occurs:

1. Payment of Services

DEED-VRS/SSB is the primary payer for job-related services (services supporting job development, placement and employment stability) for common ~~customers~~[participants](#). Once employment stability is established, DHS-DSD will continue to pay for long-term supports to maintain employment for ~~customers~~[individuals](#) of all ages. DHS-DSD will also pay for services that assist people in making informed choices and developing informed employment goals.

2. Interagency Planning and Policy Development

DHS-DSD and VRS/SSB will use strategic planning, troubleshooting, consultation and technical assistance to ensure successful implementation of this agreement. Key areas include goal setting, systems development, coordination of services, quality assurance, data and stakeholder involvement. We will:

- Meet as an interagency steering committee to provide MOU oversight, set goals, review program services and financing options, identify promising practices and resolve disputes
- Support program liaisons from VRS/SSB and DHS-DSD to coordinate joint efforts in communication, quality assurance, training, and coordination of services, policies and procedures
- Create work groups as needed to provide advice and share expertise regarding practice ~~—enhancements~~
- Hold periodic staff meetings across agencies to ensure coordinated communication and address policy issues

- ~~Establish an advisory committee that includes stakeholders from VRS/SSB, DHS-DSD, lead agency, and providers of both vocational rehabilitation services and waiver services to discuss progress and challenges with the MOU~~

- Jointly meet with stakeholders to collect feedback and identify areas for improvement
- Understand employment outcomes in our respective programs and develop a shared understanding of outcome measures and reporting procedures
- Promote the use of evidence-based practices and/or promising approaches to create a more closely aligned employment service system, increase quality and gather shared data on employment outcomes
- Identify common [customers/participants](#) and practices that support positive employment outcomes

3. Eligibility, Referrals, and Customer Flow

DEED-VRS/SSB and DHS will continue to implement and refine the processes and practices developed under the Engage, Plan, Find, Keep framework. This includes promoting regional and local collaboration, E1MN training curriculum, and the tools and resources to support this work on the Disability HUB work toolkit.

4. Service Provider Networks

DEED-VRS/SSB and DHS will continue to work together to increase our statewide, shared network of employment service providers to improve access, support seamless transitions, and expand individuals' choices to high quality employment services. As part of this work, we agree to:

- Evaluate strategies for a common employment service provider pool. We will continue to explore options for creating a shared job search service provider pool to support seamless service delivery and prevent unnecessary interruptions as people move between supports funded by VRS/SSB and supports funded by DHS-DSD.
- Encourage dual enrollment of employment service providers. While DHS and DEED will continue to maintain separate employment service provider licensure/accreditation standards, we will make it easier for providers to understand our respective standards and develop strategies to provide ongoing communication and technical assistance to those interested in enrolling.
- Align and streamline process and efforts. We will explore opportunities to better align and streamline each agency's business processes and requirements to create consistency and efficiencies for dually enrolled employment service providers.
- Coordinate communications and training. We will coordinate service provider communications and training to maintain consistent messaging and increase understanding of each agency's respective system and the shared customer flow outlined in this agreement.
- Measure and promote provider performance. We will explore methods to assess and provide information on service provider performance to people with disabilities and their families to support informed selection of service providers.

- Develop new providers. We will analyze data, set goals and collaborate on the development of employment service providers in [underserved populations and areas](#) ~~of~~[across](#) the state.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

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The primary Minnesota agency responsible for services for individuals with disabilities is the Department of Human Services (DHS). In Minnesota, the Governor's Council on Developmental Disabilities serves to advocate for all persons with developmental disabilities by carrying out activities in major areas of emphasis. Minnesota's Olmstead Plan supports freedom of choice and provides a framework and a series of key activities that must be achieved to ensure Minnesotans with disabilities have opportunities to live, learn, work, and enjoy life in the most integrated setting desired by the person. Former Governor Mark Dayton appointed an Olmstead Subcabinet to develop and implement this plan. The Subcabinet consists of representatives of the [Minnesota State Interagency Committee \(MnSIC-agencies listed above, which includes the departments of Education, Employment and Economic Development, Commerce, Corrections, Health, Human Rights, and Human Services\)\)](#), the Housing Finance Agency, the Department of Transportation, the Ombudsman for Mental Health and Developmental Disabilities, and the Executive Director of the Governor's Council on Developmental Disabilities. VRS is involved in the following joint project with the above agencies:

Minnesota Customized Employment Training:

Customized Employment (CE) is [a promising practice and is an evidence-based alternative for helping that supports](#) people with significant disabilities to [become successfully employed identify their strengths, abilities and conditions for successful employment that can lead to competitive, integrated employment by meeting employers' needs](#). At the foundation of CE is Discovery, which is a process for uncovering a person's strengths, interests and the conditions under which they will be successful in employment. DEED-VRS and ~~DHS~~ Minnesota State Operated Community Services ([MSOCS](#)), developed an Association of Community Rehabilitation Educator (ACRE) certified Customized Employment curriculum and training. ~~It also called Minnesota Customized Employment (MNCE). MNCE training intentionally~~ includes mentoring supports to DEED, Community Rehabilitation Partner and School District staff to reach [a level of](#) competent, practitioner level ~~delivery~~ of Customized Employment Services ~~for persons requiring it that is sustainable, ongoing, DEED-VRS and cost effective for MSOCS leadership believe in the importance of offering MNCE Training to practitioners in~~ the state disability employment [services](#) system. ~~This~~ [MNCE](#) training is offered at no cost, multiple times each year.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

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The Minnesota Department of Human Services (DHS) is responsible for coordinating mental health services for adults and youth. Minnesota's Mental Health system is a state mandated, county operated system. The State Mental Health Authority is responsible for ensuring that Minnesota's 87 counties, the local mental health authority, provide an array of community mental health services including: Basic clinical services, community services and supports, hospitalization and residential treatment. Funding for Minnesota's mental health system comes from health care insurance, including Medicaid, private insurance and MinnesotaCare, as well as county local tax levy funds, state mental health funds and Federal Block grant funds. The Minnesota VRS program has a long history of innovative collaboration with the State Mental Health Authority. This includes VR representation on the State Mental Health Advisory Council

and the State Behavioral Advisory Council. The two agencies have collaborated to implement, sustain, and expand the evidence-based practice of supported employment, Individual Placement and Support (IPS). Starting with 4 local partnerships between mental health and employment providers in 2006, the IPS provider network in Minnesota, funded in part with state appropriations dedicated to IPS, ~~has expanded to 20~~includes 15 IPS programs (partnerships between mental health agencies and employment service agencies) in 4537 of Minnesota's 87 counties. Minnesota's VR and Behavioral Health Division are partners in the International IPS Learning Community.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

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Minnesota VR has a statewide network of eight private, nonprofit centers for independent living that operate in partnership with us. Each of these regional centers provides four core services: Information and Referral, Skills Training, Peer Counseling, and Advocacy. Additionally, these 8 IL centers are contracted to complete our Workforce Innovation and Opportunity Act (WIOA), Section 511 work on the limitations on the use of subminimum wages. WIOA requires an annual conversation with individuals who are earning less than the federal minimum wage (\$7.25) about work options, career counseling, information, and referral information.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

The VR program provides specialized, one-on-one employment services for individuals with disabilities. While VR program state-staff provide some services directly, the VR program also partners with businesses and organizations in local communities throughout the state to provide employment services. A Community Partner must have a Professional/Technical Master Contract (P/T Contract) with the VR program to provide services as a Community Partner for an individual in the VR program. The P/T Contract is the mechanism that contains the employment services structure, expectations, purchases, and pricing. The VR program purchases services such as vocational evaluation, skill training, internships, job development and job placement, on-the-job training, and time-limited job coaching. Services must be consistent with an individualized plan for employment developed between counselor and participant, based on the participant's informed choices and offered in competitive, integrated settings.

Community Partners:

Minnesota distinguishes between two categories of community rehabilitation providers: a "limited-use vendor" (LUV) and the unlimited use community rehabilitation program (CRP). This arrangement permits wide selection of services and system flexibility and emphasizes the use of providers accredited by the national Commission on Accreditation of Rehabilitation Facilities (CARF).

Community Partners designated as Community Rehabilitation Programs (CRPs) are accredited by CARF. Accreditation represents an industry assurance that the CRP meets or exceeds nationally and internationally recognized service standards and is focused on delivering the most favorable results for persons served. Per state rule, service providers that are CARF accredited have no pre-determined maximum budget cap for their P/T contract. A budget maximum is negotiated with the VR program as part of the contract application and negotiation process.

Community Partners designated as Limited-Use Vendors (LUVs) are service providers that are not CARF-accredited. Per state rule, VRS must limit the amount of business it does with LUVs through funding limits and shorter contract terms. Upon negotiation with the VR program, LUVs

may conduct business up to \$100,000 a year with VRS after a Professional and Technical (P/T) Services Master Contract has been approved. Limited use providers (those without CARF accreditation) introduce competition and choice to the rehabilitation marketplace and provide an entry point for new providers in response to an unmet or emerging service need.

Written Assurances:

Providers must provide written assurances about their organizational missions, operations (including audits and lines of authority), staff development and qualifications, services, fees, populations served, standards of professional practice, and adherence to [customers' participants'](#) employment plans. They must also provide written assurance regarding vendor compliance with the Americans with Disabilities Act, Minnesota Human Rights Act and other employment law on individual rights, accessibility, occupational health and safety, and data privacy.

VRS Support for Community Partners:

VRS employs 4 program specialists to help maintain a mutually supportive professional relationship and to negotiate modifications to agreements with Community Partners. VRS and Community Partners work together to promote mutually held goals, including:

Develop and maintain choices for participants.

- Meet workforce needs identified by the state's employers.
- Ensure that services are provided in competitive and integrated settings.
- Facilitate state-level planning and coordination of training needs of Community Partner staff.
- Facilitate communication between VRS and Community Partner staff at the administrative level.
- Increase Community Partner awareness of vocational rehabilitation issues at state and national levels.
- Identify and provide training for Community Partner and VRS staff.

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, 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 VR agency must select the "Edit" button to review and agree to the VR State plan Assurances.

The State Plan must 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

The State Plan must include
Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
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. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
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. as applicable, 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.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements 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

The State Plan must include
expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
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)(E) 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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
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 the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 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.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and

The State Plan must include
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
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.
6. Financial Administration of the Supported Employment Program (Title VI):
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)(H) and (I) 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:
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 the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?
Yes

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 TITLE IV OF WIOA^[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

^[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Minnesota Department of Employment and Economic Development

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN^[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS^[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) 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;

^[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

^[3] 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.

^[4] 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 at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Minnesota Vocational 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, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE

ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN^[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS^[6], 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;

^[5] 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.

^[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY 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 AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

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

DSU Director Dee Torgerson

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

DSU Director Dee Torgerson

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

^[1] Public Law 113-128.

^[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the “Edit” button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link to the blank table](#). You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Dee Torgerson
Title of Signatory	Vocational Rehabilitation Services Director
Date Signed	3/25/2025

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the

negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	57.7	58.0	57.7	58.5
Employment (Fourth Quarter After Exit)	55.6	57.9	55.6	58.0
Median Earnings (Second Quarter After Exit)	3,850.00	3,850.00	3,850.00	4,042.00
Credential Attainment Rate	44.0%	44.5	44.0%	45.0
Measurable Skill Gains	48.0%	50.7	48.0%	51.2
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Minnesota Department of Employment and Economic Development (DEED) Vocational Rehabilitation Services (VRS) ~~is committed~~ is committed to ~~cultivating a workplace~~ culture that encourages collaboration, flexibility, and fairness to enable all individuals to contribute to their full potential. Our mission, philosophy, and values embody equitable access to, and participation in, the Vocational Rehabilitation Program. We have Accessibility Champions imbedded into our agency who are dedicated staff trained on accessibility. In the past year, VRS has hired dedicated staff ~~and formalized a Diversity, Equity, Inclusion and Accessibility committee~~ to develop initiatives to recruit and retain staff that is reflective of our ~~customer-participant~~ base. We are also in early stages of developing an outreach plan to increase public awareness and recognize the need to specifically target underrepresented groups. ~~Our State Rehabilitation Council shares our commitment to diversity.~~ DEED policies strictly prohibit any form of harassment or discrimination based on ~~the following protected classes:~~

1. Race
2. Color
3. Creed
4. Religion
5. National origin
6. Sex* (includes pregnancy, childbirth, and related medical conditions)
7. Marital Status
8. Familial Status
9. Receipt of public assistance
10. Membership or activity in a local human rights commission
11. Disability
12. Age
13. Sexual orientation
14. Gender identity
15. Gender expression
16. For employees, genetic information

VRS staff are actively engaged in various boards and workgroups where we are able to advocate for individuals with disabilities, including the Governor's Workforce Development Board, the Olmstead Implementation Advisory Group, Minnesota Council on Disability, and Minnesota Governor's Council on Developmental Disabilities.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE
EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER
BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

1. Economically disadvantaged:
 1. May be unable to afford transportation, assistive technology, broadband Internet service, childcare, housing, or other support services that contribute to accessing VR services or participating in a rehabilitation program.
2. Gender:
 1. May face gender bias (unintentional or otherwise) or stereotyping.
 2. May not be presented with the full range of programs and services available to them because of bias or preconceived ideas about abilities.
3. Race, ethnicity, color, national origin, language, migrant status:
 1. May face prejudice, bias, stereotyping, or cultural insensitivity.
 2. Maybe unaware of VR services because of a lack of information or outreach in their native language.
 3. May need language interpreters for effective communication with VR or other service delivery staff.
 4. May need written communication generated by VR or agencies in their native language.
4. Disability:
 1. May have a barrier to transportation that is not accessible.
 2. May need AT to access programs and services.
 3. May need information in alternate formats.
 4. May need interpreters for communication.
 5. May face physical accessibility issues at some service providers or community businesses.

6. May face discrimination or stereotyping in the community.
5. Rural status:
 1. May face barriers due to lack of transportation
 2. May have limited broadband connectivity.
 3. May have limited services available in the community due to a lack of providers.
6. Age:
 1. May experience bias or stereotyping.
 2. May need AT or physical restoration services to access programs and services.
7. Homeless status or housing insecurity:
 1. May experience all of the barriers faced by low-income individuals.
 2. Lack of a stable living environment may affect ability to receive communication.
 3. May experience bias or stereotyping.
 4. Lack of access to treatment for behavioral health issues may affect ability to access services and sustain engagement.
8. Pregnancy, parenting or caregiver status:
 1. May face childcare or caregiving issues that limit ability to participate in programs or services.
 2. May experience bias or stereotyping.
9. Sexual Orientation:
 1. May face bias and discrimination.
 2. May have experienced trauma and resulting mental health concerns.
3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

VRS seeks to address barriers in several ways:

- VRS puts a high priority on and will continue to provide training to our staff to promote awareness of and to address potential barriers. We provide several training opportunities throughout the year and have a plethora of asynchronous trainings available through our learning management system. One area of focus will be to train staff to ~~recognize and understand implicit bias to reduce potential~~ negative impacts on service delivery and experiences.
- VRS will promote the use of assistive technology “labs” in 20 offices across the state, allowing individuals to try out and determine what AT works best for them.
- ~~VRS will expand public awareness of our services to both adults and youth from the wider population of Minnesotans with disabilities who could benefit from services.~~
- VRS will create and sustain a strong network of internal talent and external partners whose shared passion accelerates the delivery of seamless disability employment and independent living services.
- VRS will work to improve process and the ~~customer stakeholder~~ experience through digital transformation.
- VRS instituted a policy of meeting people where they prefer, including in private residences. This alleviates many of the barriers identified above.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

- VRS will work through calendar year to implement an outreach strategy and to develop a digital roadmap in PY25.
- Staff training is ongoing, and related courses are available to staff throughout the year. Specifically, new employees are required to take "Awareness, Belonging, and Courageous Leadership Part 1" training within 6 months of hire. Additionally, ethics training, in which there is a cultural component, is also required for new staff and then every five years.
- The assistive technology “labs” will be fully in place by the start of PY25.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED
EMPLOYMENT

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
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1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Minnesota Department of Employment and Economic Development (DEED) Vocational Rehabilitation Services (VRS) ~~is committed~~ is committed to ~~cultivating a~~ cultivating a culture that encourages collaboration, flexibility, and fairness to enable all individuals to contribute to their full potential. Our mission, philosophy, and values embody equitable access to, and participation in, the Vocational Rehabilitation Services program. Supported Employment (SE) services are provided to individuals with the most significant disabilities, specifically to those accessing Medicaid Waivers. Through appropriate modes of communication, each applicant and recipient of VR Services must be given the information necessary to make informed choices on who they want to access for supported employment services. Individuals who need assistance in exercising informed choice must be made aware that support services are available. ~~Our State Rehabilitation Council shares our commitment to diversity.~~ DEED policies strictly prohibit any form of harassment or discrimination based on ~~the following protected classes:~~

1. Race
2. Color
3. Creed
4. Religion
5. National origin
6. Sex* (includes pregnancy, childbirth, and related medical conditions)
7. Marital Status
8. Familial Status
9. Receipt of public assistance
10. Membership or activity in a local human rights commission
11. Disability
12. Age
13. Sexual orientation

14. Gender identity
15. Gender expression
16. For employees, genetic information

VRS staff are actively engaged in various boards and workgroups where we are able to advocate for individuals with disabilities, including individuals with most significant disabilities, such as the Governor's Workforce Development Board, the Olmstead Implementation Advisory Group, Minnesota Council on Disability, and Minnesota Governor's Council on Developmental Disabilities.

**2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE
EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER
BENEFICIARIES?**

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

- Funding for supported employment, within which Title VI Part B funds play a relatively small part, is governed by myriad federal and state laws and rules covering many categories of services. This makes it difficult to spend the funds.
 - Due to regulations, the inability to spend more on adults than we do on youth is a barrier to utilize these funds. We are not able to spend significant funds on youth because they are not in long term jobs.
- Lack of job coaches, especially during evenings and weekends
- Lack of specialists trained in mental/behavioral health, chemical dependency, and learning disabilities
- Lack of transportation
- Lack of providers
- Lack of understanding or misunderstanding of how the three state agencies can partner together to support individuals with disabilities on waivers (MDE, DHS, DEED)
- Lead Agency/county level and waiver case managers not understanding our partnership or how to best support individuals with employment supports.

- Employers who are willing to hire people with disabilities, especially those with most significant disabilities.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Several initiatives are currently underway to serve individuals with the most significant disabilities. The most prominent one is E1MN, Minnesota's state agency partnership to advance Employment First outcomes for youth and adults with disabilities currently on Medicaid waivers. The Minnesota Department of Human Services Disability Division (DHS-DSD), Department of Education (MDE), and the Department of Employment and Economic Development (DEED) are working together to deliver a more seamless and timely employment support system for those on waivers. Key areas include a framework that outlines and clarifies the roles and responsibilities for professionals, training resources for all partners, tools, resources, and technical assistance to support collaboration at the local level across the state. The Department of Human Services received funds in FY23 to conduct an interagency alignment study dissecting ways to better align our systems values, rates, data practices, and more to more efficiently support individuals on waivers who access services from all three agencies.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

This work is underway as DHS prepares to engage with a consultant to help with the work through FY25. The goal of this work is to eliminate unnecessary barriers to accessing employment services. Additionally, the E1MN planning team has been coordinating regional

meetings across the state during FY23 and FY24 to bring together key professionals to facilitate collaboration and address barriers in specific communities for individuals with disabilities seeking employment services.

VOCATIONAL REHABILITATION – MN STATE SERVICES FOR THE BLIND 2024

Program-Specific Requirements for State Vocational Rehabilitation Services Program

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

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(a) State Rehabilitation Council. All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has established a State Rehabilitation Council for the Blind.

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(select A or B):

☐ (A) is an independent State commission.

☒ (B) has established a State Rehabilitation Council.

2. In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

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Council Representative	Current Term Number/ Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	~~2~~ 1	~~2/2022~~ 1/2025
Parent Training and Information Center - PACER REP	1	31/2024
Client Assistance Program	1	~~2/2023~~ 1/2025
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	~~2/2023~~ 1/2025
Community Rehabilitation Program Service Provider	1	3/2024
Business, Industry, and Labor	~~1~~ 2	~~3/2024~~ 1/2025
Business, Industry, and Labor	1	31/2024
Business, Industry, and Labor	1	~~2/2022~~ 1/2024
Business, Industry, and Labor	~~2~~ 1	~~4/2024~~ 1/2024
Disability Advocacy Groups	~~2~~ 1	~~2/2022~~ 1/2024
Disability Advocacy Groups	~~2~~ 1	3/2024
Disability Advocacy Groups	~~1~~ 2	3/2024
Current or Former Applicants for, or Recipients of, VR services	~~1~~ vacant	~~3/2024~~ vacant

Current or Former Applicants for, or Recipients of, VR services	2	3/2024
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1	~~3/2024~~ 1/2023
State Workforce Development Board	~~Vacant~~ 1	~~vacant~~ 1/2025
VR Agency Director (Ex Officio)	Ex Officio	8/2019
Advocate for Individuals who are Blind with Multiple Disabilities	2	~~3~~ 1/2024
DeafBlind Community Representative	~~1~~ 2	~~3/2024~~ 1/2025
Section 121 Project Directors in the State (as applicable) - American Indian VR Projects	1	41/2024

If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

The Minnesota State Rehabilitation Council for the Blind (SRC-B) meets the first Thursday of every December, February, April, June, August, and October from 5:30 PM to 8:30 PM. Meetings are held in-person at SSB with a hybrid option over Zoom. Up until early March 2025, all council positions were filled and we had no open positions on the council.

The Minnesota State Rehabilitation Council for the Blind (SRC-B) meets the first Thursday of every December, February, April, June, August, and October from 5:30 PM to 8:30 PM. Historically, SSB has had difficulty having council appointments approved by the Governor's office due to changing administrations and frequently changing staff. SSB makes an effort to personally connect with the Boards and Commissions staff to provide information and education on SSB in an effort to increase the speed of the approval process. Up until early March 2024, we had several open positions due to completed terms, retirements, or individuals leaving the employment tied to their council position.

The SRC-B staff liaison had continual contact with the governor's office staff who work on appointments. For our April 3, 2025, SRC-B meeting, all seats were filled. Outreach to fill these positions was done by informing staff, council members, community partners, and customers through direct conversations, email campaigns, and our monthly newsletter reaching up to 5,000 subscribers.

The SRC-B staff liaison had continual contact with the governor's office staff who work on appointments. Boards and Commissions staff indicated that they would complete all appointments in November. When those appointments did not occur in November or December, weekly email communications were sent to the Governor's office staff from January through March until the appointments were completed. For our April 4, 2024, SRC-B meeting, we will have all but one seat filled. Outreach to fill these positions was done by informing staff, council members, community partners, and customers through direct conversations, email campaigns, and our monthly newsletter reaching up to 5,000 subscribers.

3. In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

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The SRC-B develops and follows a yearly workplan to ensure that it carries out all its duties in a timely fashion. The majority of workplan entries occur on an annual or semiannual basis; however, as new recommendations from the council are made, they can be added. The Committee Structure Task Force works annually in collaboration with SSB to review the council committee charge and structure to determine if any changes are needed.

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~~The SRC-B develops and follows a yearly workplan to ensure that it carries out all its duties in a timely fashion. The majority of workplan entries occur on an annual or semiannual basis; however, as new recommendations from the council are made, they can be added.~~

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The SRC-B has a standing "Customer Satisfaction and Goals & Priorities Committee," which exists to carry out specific duties contained in federal regulations for the Vocational Rehabilitation (VR) program. These include conducting a review and an analysis of the effectiveness of, and consumer satisfaction with:

- The functions of the Department of Employment and Economic Development.
 - Vocational Rehabilitation services provided within the state (except adjustment to blindness and technology services).
- and
- Employment outcomes of persons served.

Each year, SSB deploys at Workforce Development Unit (WDU) Customer Satisfaction Survey (CSS) measuring overall customer satisfaction with Minnesota State Services for the Blind's (SSB) services. Surveying began in April 2006 and continues yearly. Survey methods have evolved from counselor issued pre/post evaluations, phone interviews through an independent survey company, and currently to DEED managed email surveys. The Customer Satisfaction, Goals, and Priorities Committee reviews results and responses from the annual WDU survey and uses that data to help shape recommendations for SSB's annual Goals and Priorities. The committee and SSB jointly develop the goals and priorities. In preparation for their development, the SRC-B committees are asked to submit their recommendations to SSB. The draft goals and priorities were presented to the SRC-B at the November 10, 2025, meeting and received a unanimous vote of approval.

The SRC-B has a standing "Community Partners Outcomes and Measures Committee". This committee exists to support and advise SSB regarding measuring the outcomes realized by the recipients of training in Adjustment to Blindness (ATB) and Assistive Technology (AT). This committee provides input to the Customer Satisfaction & Goals and Priorities Committee and the full Council for consideration in the development of annual goals and priorities in conjunction with SSB and will monitor those goals and priorities throughout the year. This committee is responsible for distributing an annual survey measuring customer satisfaction with SSB services. Surveying

began in April 2006 and continues yearly. Survey methods have evolved from counselor issued pre/post evaluations, phone interviews through an independent survey company, and currently to DEED managed email surveys. Surveys are sent out on a quarterly basis with an annual report due to a low number of individuals available to survey.

In collaboration with SSB, the committee evaluates the extent to which SSB achieved its goals and priorities, strategies used, and factors that impeded success and performance on the federal Workforce Investment Opportunity Act (WIOA) Primary Indicators of Performance. Jointly with other committees of the Council, and in partnership with SSB, it develops and, as necessary, revises a statement of goals and priorities. The committee reports quarterly to the full SRC-B and annually presents the VR Effectiveness Report to the SRC-B for review and approval. The VR Effectiveness Report contains: Part I – State’s Performance Under the Performance Accountability Measures of Section 116 of WIOA, Part II – Customer Satisfaction Survey Review, and Part III – Review of Goals and Priorities. The committee includes the VR Effectiveness Report in the Annual SRC-B report. The PY23 VR Effectiveness Report and the Annual SRC-B Report were presented to the SRC-B at the December 7, 2023 meeting and is available at https://mn.gov/deed/assets/srcb-annual-report-2025-acc_tcm1045-716886.pdf <https://mn.gov/deed/ssb/involve/srcb/reports/index.jsp>.

The SRC-B has a standing “Community Partners Outcomes and Measures Committee”. This committee exists to support and advise SSB regarding measuring the outcomes realized by the recipients of training in Adjustment to Blindness (ATB) and Assistive Technology (AT). This committee provides input to the Customer Satisfaction & Goals and Priorities Committee and the full Council for consideration in the development of annual goals and priorities in conjunction with SSB and will monitor those goals and priorities throughout the year. ATB Surveys are sent out on a quarterly basis.

The Community Partners Outcomes and Measures Committee has conducted a review of the current ATB Customer Satisfaction Survey response rates. Their goal was to address low response rates and provide recommendations to enhance the effectiveness of post-training surveys. The committee developed three recommendations regarding data collection, survey delivery method, and survey timing and automation. The information was presented at the November 10, 2023 meeting.

Survey results for both the ATB Survey and the WDU Survey can be found on the SSB SRC-B webpage: Customer Satisfaction Surveys / State Services for the Blind

Additionally, the committee and SSB jointly develop the goals and priorities. In preparation for their development, the SRC-B committees are asked to submit their recommendations to SSB. In 2023, there were no recommendations from the committees to review, and SSB and the Customer Satisfaction and Goals & Priorities committee jointly developed goals and priorities for the program year 2024. The draft goals and priorities were presented to the SRC-B at the October 5, 2023, meeting. The final goals and priorities were presented to the SRC-B at the December 7, 2023, meeting and received a unanimous vote of approval.

A Budget Task Force works annually in collaboration with SSB to propose the SRC-B’s budget for next federal fiscal year. SSB provides the task force with the budget expenditures so that

determinations can be made. The council's budget for ~~FFY24~~ FFY25 was presented by the Budget Task Force and approved at the August ~~3, 2023~~ 7, 2025 meeting.

~~In an effort to increase diversity, equity, and inclusion, the SRC-B developed a Task Force on Guest Speakers or Professional Development with the purpose of adding to knowledge of how the council can learn more about SSB; finding community members representing Hmong, Hispanic, Somali, and Native American cultures; and hearing from medical professionals regarding providing SSB information to individuals with vision loss. The task force reported to the council at the October 6, 2022, meeting and recommended that this group continue meeting regularly and be added to the annual work plan.~~

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The Committee Structure Task Force works annually in collaboration with SSB to review the council committee charge and structure to determine if any changes are needed. At the June 2, 2023, meeting, the task force presented their report recommending the change in name of the Minority Outreach Committee to Diversity, Equity & Inclusion Committee. It was felt that the proposed name was more encompassing and positive. The SRC-B unanimously approved the change.

At the June 2, 2023, meeting, the SRC-B was presented a report by Jessica Burke, Consultant, Management Analysis & Development (MAD). SSB contracted with MAD as internal independent consultants to identify barriers that customers are facing and find ways to reduce or eliminate those barriers. The council expressed their concerns with the report, specifically with the lack of effort to reach survey participants, and lack of accessibility in communication. As result, at the August 3, 2023, meeting, the council unanimously voted to send the *Recommendations for Improving DEI Practices Within Minnesota State Services for the Blind*, presented by the Diversity, Equity, and Inclusion Committee, to Jessica Burke.

A brief public hearing was held at the August 3, 2023, meeting regarding the order of selection (OOS) process and SSB's intent to end OOS. Unanimous support for the end of the order of selection process was given by the council.

Additionally, at the August meeting the council discussed the pros and cons of joining the National Coalition of State Rehabilitation Councils (NCSRC). The NCSRC had provided a report about membership and signing the resolution during the June 2, 2023, council meeting. Council members shared their concerns regarding NCSRC and the lack of accessibility. After the discussion, a motion to join NCSRC failed for the absence of a second. It was decided that the council would gather more information before reconsidering joining the coalition. The SSB SRC-B staff liaison and one council member attended the NCSRC 2023 fall conference in Savannah, Georgia, and they reported their observations during the December 7, 2023, council meeting. While the council recognized that it is important to be informed of new legislation and stay connected with the coalition, they remained reluctant to join and a vote was not called.

Sections pertaining to the proposed funding of establishment projects occurring at the 2200 University Avenue building were presented to the SRC-B on October 5, 2023, and were unanimously approved.

The Community Partners Outcomes and Measures Committee has conducted a review of the current ATB Customer Satisfaction Survey response rates. Their goal was to address low response rates and provide recommendations to enhance the effectiveness of post-training surveys. The committee developed three recommendations regarding data collection, survey delivery method, and survey timing and automation. The information was presented at the December 7, 2023 meeting.

SSB shared its intentions with the Council at the December 7, 2023, and February 8, 2024, meetings, to decline supported employment dollars and coordinate with the general agency, as they will be assuming the funds. SSB answered council questions and provided explanation for declining the supported employment funds. The council did not express any disagreement with this decision.

5. Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

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[List each recommendation/input followed by the VR agency response]

Recommendation/Input

April 3, 2025 – Disability Innovation Fund (DIF)

The Council discussed forming an advisory committee for the Disability Innovation Fund (DIF) Grant, led by newly appointed project director Dacia VanAlstine. The committee will guide the Evolve Employment Grant by meeting regularly to provide feedback and strategic input. Two possible structures were proposed: a subcommittee under the Council or an independent advisory body. Council members expressed support for keeping it within the Council for alignment and oversight, while also ensuring public participation. The Council will continue discussions and revisit the structure in future meetings.

SSB Response:

At the September 25th council meeting, Director Natasha Jerde shared that the DIF Advisory Task Force application launched earlier in the week and would remain open for two weeks. The application link was sent to all Councilmembers. The task force will include up to eight members representing various perspectives, including recipients of services and advocacy organizations.

Recommendation/Input:

April 3, 2025 – Needs Assessment

The Needs Assessment Taskforce reported that due to ongoing federal and budgetary changes, SSB no longer has funding to contract an Independent Statewide Needs Assessment and does not expect that funding to return in the foreseeable future. However, SSB still intends to conduct

an internal assessment, as it has done in the past, regardless of shifting federal requirements. The agency remains committed to maintaining high standards of service and believes that continuing this assessment aligns with that goal. Moving forward, SSB plans to use its existing infrastructure, such as public meetings and engagement with community organizations, to gather information about the needs of Minnesotans who are blind, low vision, or DeafBlind. Emphasizing a participatory approach, SSB aims to work with community members—particularly from overlooked groups—to determine the best ways to collect data. By consulting directly with these communities, SSB hopes to ensure the process is reflective of their unique perspectives, keeping the spirit of the needs assessment alive even without federal mandates.

SSB Response:

The Needs Assessment taskforce decided to hold open listening sessions to gather feedback from customers and the community on how SSB can better serve blind, low vision, and DeafBlind Minnesotans. Listening sessions were conducted in end of July 2025 and included separate sessions for youth and DeafBlind. Feedback was collected and suggestions incorporated into the 2026 SSB Goals and Priorities.

Recommendation/Input:

June 5, 2025 – Committee Structure Task Force

The Committee Structure Task Force met twice in 2025 to update the committee framework, primarily building on the work from 2024. The updates included several language changes, such as replacing “visually impaired” with “low vision” and standardizing the spelling of “DeafBlind” with capital D and B. The phrase “resource plan” was changed to “budget” for clarity, and committees were given the option to appoint anyone, not just staff, to take meeting minutes. The Minority Outreach Committee was renamed to the Diversity, Equity, and Inclusion (DEI) Committee, with plans to update the associated website URLs accordingly. The Task Force also replaced the term “minoritized” with “marginalized” to describe groups, aiming for broader understanding. The DeafBlind Committee’s description was revised to focus on individuals with combined functional hearing and vision loss. Additionally, the Task Force recommended that committees conduct an annual review of their charges and submit proposed updates each April for consideration. Redundant, abbreviated committee descriptions were removed to encourage members to refer to full descriptions on the committee pages.

SSB Response:

SSB is in agreement with the changes. It is in line with our state and agency goals and is more encompassing and positive.

Recommendation/Input:

September 25, 2025 – Work Authorization Task Force and Housing Policy Task Force

The Work Authorization Task Force is a new task force of the Minnesota State Rehabilitation Council for the Blind (SRC-B) established to examine how work authorization requirements, immigration status, and related eligibility policies affect individuals who are blind, low vision, or DeafBlind in accessing vocational rehabilitation services and achieving employment outcomes. The task force identifies barriers, reviews relevant state and federal policies, gathers input from affected communities and partners, and develops findings and recommendations for consideration by State Services for the Blind (SSB) and the full Council.

The Housing Policy Task Force is a task force of the Minnesota State Rehabilitation Council for the Blind (SRC-B) was created to review housing-related barriers that impact individuals who are blind, visually impaired, or DeafBlind, particularly as they relate to employment, independence, and participation in vocational rehabilitation services. The task force examines housing stability, accessibility, and affordability, reviews relevant housing policies, gathers feedback from consumers and stakeholders, and develops recommendations to share with State Services for the Blind (SSB) and the full Council.

SSB Response:

SSB is in agreement with the suggestions. The call was made to solicit members to sit upon both task forces.

The PY22 VR Effectiveness Report and the Annual SRC-B Report were presented to the SRC-B and approved at the December 7, 2023, meeting.

SSB Response:

SSB has worked in collaboration with the SRC-B and the Customer Satisfaction and Goals & Priorities Committee to develop these reports.

Recommendation/Input

The PY2024 Goals and Priorities were presented to the SRC-B and approved at the December 7, 2023, meeting.

SSB Response:

SSB has worked in collaboration with the SRC-B and the Customer Satisfaction and Goals & Priorities Committee to develop these Goals and Priorities.

Recommendation/Input

The council's budget for FFY24 was presented by the Budget Task Force and approved at the August 3, 2023, meeting.

SSB Response:

SSB has worked in collaboration with the SRC-B to develop the FFY24 budget. The council's budget has remained consistent for several years and is reasonable and appropriate.

Recommendation/Input

The task force on Guest Speakers or Professional Development reported to the council at the October 6, 2022, meeting and recommended that this group continue to meet regularly and be added to the annual work plan.

SSB Response:

SSB agrees with the task force and guest speakers or professional development activities have been added to the

SRC-B Work Plan.

Recommendation/Input

At the June 2, 2023, meeting, the Committee Structure Task Force presented their report recommending the change in name of the Minority Outreach Committee to Diversity, Equity & Inclusion Committee.

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SSB Response:

SSB is in agreement with this change. It is in line with our state and agency goals and is more encompassing and positive.

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Recommendation/Input

At the August 3, 2023, meeting, the council unanimously voted to send the *Recommendations for Improving DEI Practices Within Minnesota State Services for the Blind*, presented by the Diversity, Equity, and Inclusion Committee, to Jessica Burke.

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SSB Response:

SSB felt the recommendations were impressive and encompasses some items that have been previously discussed internally. SSB suggested that these recommendations come from the council directly to Jessica and SSB, as they could carry more weight.

Recommendation/Input

Unanimous support for the end of the order of selection process was given by the council.

SSB Response:

We are in agreement with the SRC-B and it was announced that SSB would swiftly end the order of selection process. Order of selection ended on November 16, 2023.

Recommendation/Input

Council members shared their concerns regarding NCSRC and the lack of accessibility. After discussion, a motion to join NCSRC failed for the absence of a second. It was decided that the council would gather more information before reconsidering joining the coalition.

SSB Response:

SSB is available to answer questions and provide information to the SRC-B as requested and will leave this decision with the council.

Recommendation/Input

Sections pertaining to the proposed funding of establishment projects occurring at the 2200 University Avenue building were presented to the SRC-B on October 5, 2023, and were unanimously approved.

SSB Response:

SSB agrees with the SRC-B.

Recommendation/Input

The Community Partners Outcomes and Measures Committee has conducted a review of the current ATB Customer Satisfaction Survey to address low response rates and provide recommendations to enhance the effectiveness of post-training surveys. The committee developed three recommendations regarding data collection, survey delivery method, and survey timing and automation. The information was presented at the December 7, 2023, meeting.

SSB Response:

SSB is reviewing the committee's recommendations in further detail. We acknowledge that the ATB Customer Satisfaction Survey is not providing the information it was intended to provide. There are multiple reasons for the low response rates, one of which is a low number of participants. SSB is working with the DEED Survey Coordinator, who oversees the administration of the current survey method, to investigate the possibilities of alternative survey delivery methods. Some ideas include returning to delivering surveys via phone and contracting with a third party to conduct focus groups. SSB will continue gathering information until it is able to make a determination.

(b) Comprehensive Statewide Needs Assessment (CSNA). Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

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(1) The VR services needs of individuals with disabilities residing within the State, including:

(1) Individuals with the most significant disabilities and their need for Supported Employment;

Supported Employment services are provided to SSB customers as needed. In PY2024, there were 60 customers with Supported Employment (SE) plans, 14 of whom had also received Pre-ETS outside of the SE plan. To date in PY2025, there are 46 customers with SE plans, 8 of whom also had received Pre-ETS outside of the SE plan. With regards to youth, SSB is committed to providing all students work experiences with or without supported employment services. SSB believes that individuals with the most significant of disabilities benefit from early intervention

services, including Pre-ETS. While Pre-ETS are not considered supported employment services, they are an important part of the continuum of services available to individuals who will require supported employment services.

SSB's Pre-ETS customers often require 1x1 Adjustment to Blindness training, additional work experiences, and on-the-job supports. Unfortunately, when the pandemic hit, several contracted service providers went out of business. This resulted in large waitlists with the remaining providers, especially with employment-related services. Individuals with the most significant disabilities were unable to receive timely job coaching, work experiences, or individualized Adjustment to Blindness training. This does not even take into consideration an already limited pool of providers with the specialized knowledge and experience in working with individuals who have vision loss.

Supported Employment services are provided to SSB customers as needed. In PY2022, there were 55 customers with Supported Employment (SE) plans, 27 of whom also had received Pre-ETS outside of the SE plan. In PY2023, there were 53 customers with SE plans, 29 of whom also had received Pre-ETS outside of the SE plan. With regards to youth, SSB is committed to providing all students work experiences with or without supported employment services. SSB believes that individuals with the most significant of disabilities benefit from early intervention services, including Pre-ETS. While Pre-ETS are not considered supported employment services, they are an important part of the continuum of services available to individuals who will require supported employment services.

This group of customers often require 1x1 Adjustment to Blindness training, additional work experiences, and on-the-job supports. Unfortunately, when the pandemic hit, several contracted service providers went out of business. This resulted in huge wait lists with the remaining providers, especially with employment-related services. Individuals with the most significant disabilities were unable to receive timely job coaching, work experiences, or individualized Adjustment to Blindness training. This does not even take into consideration an already limited pool of providers with the specialized knowledge and experience in working with individuals who have vision loss.

For individuals who are DeafBlind, there is a need for locally available Adjustment to DeafBlindness training with qualified staff who are fluent in American Sign Language. Currently, the only option is to send individuals to Helen Keller National Center in New York. Many individuals do not want to leave their home communities and families for an extended period of time. There is also a need for Protactile training, and to meet this need, the only available option is in Oregon.

We are seeing more individuals with significant disabilities who also are English Language Learners. This adds additional complexities for learning the skills necessary to enter into competitive integrated employment. Minnesota has very limited community options for teaching English to individuals who are blind. Due to these factors, in 2024 SSB hired an English Language Instructor to work with customers where language is a barrier to training and employment.

~~(2) We have almost no options available for individuals who also have significant disabilities. We have very limited positive employment outcomes with this community. The main reason is due to the lack of community programs. The second reason is because we lack training in providing services to this population.~~

B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;

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As SSB is tasked with improving services to activate overlooked workers, the SRC-B Customer Satisfaction, Goals, and Priorities Committee, in coordination with the Department's survey specialist, added a demographic profile to the customer satisfaction survey results. This profile gives SSB additional information on the customer satisfaction by age, gender, race, ethnicity, geographic area, etc. The MnCSI (Minnesota Customer Satisfaction Index) measures percentage of satisfaction, with a higher number being higher satisfaction.

The Department of Administration, Minnesota State Demographic Center released *The Economic Status of Minnesotans 2023, A Chartbook with Data for Minnesota's Largest Cultural Groups*, in March 2023.

The report presents newly tabulated data about the economic conditions and considerations of Minnesotans as a whole, as well as 17 more refined cultural groups, to help policymakers and the public understand and improve the economic conditions for Minnesota's residents. The report is especially helpful in that it provides data on cultural groups specific to Minnesota that are more refined than the standard racial groups used by the Census Bureau which are too broad and may not be relevant to our state.

Although 79.2% of the population of Minnesota is white, there is a diversity of cultural groups. In reviewing Table: Minnesota's Largest Cultural Groups in the report, the top 5 cultural groups, other than White, with the highest percentage of the MN population and people can be found in the table below.

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The category of "Multiple Cultural Groups" includes people belonging to more than one of these 17 cultural groups; Dakota, Ojibwe, Asian Indian, Chinese, Filipino, Hmong, Korean, Lao, Vietnamese, African American, Ethiopian, Liberian, Somali, Mexican, Puerto Rican, Russian, and White. Additionally, the "African American" cultural group that was constructed consists of only U.S. born Black/African American individuals and their children.

2024 SSB Customer Satisfaction Survey Demographic Profile – January, 2024 to June, 2024

<u>Gender</u>	<u>Total Population (777)</u>	<u>Valid Population (710)</u>	<u>Survey Respondents (141)</u>	<u>MnCSI (122)</u>
Female	48%	49%	47%	74.8 (53)
Male	52%	51%	42%	75.7 (66)
(Blank)	<1%	<1%	1%	-

<u>Region</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
Greater MN	38%	38%	39%	73.5 (55)
Metro	62%	62%	61%	78.5 (86)
NULL	-	-	-	-

<u>SSB Status</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
Successful Closure	5%	6%	9%	89.8 (11)
Unsuccessful Closure	3%	3%	1%	--
In-progress	90%	90%	90%	73.4 (107)
(Blank)	2%	1%	1%	--

<u>Ethnicity</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>
Hispanic/Latino	6%	6%	6%
Not Hispanic/Latino	92%	92%	91%
Did not self-identify	2%	2%	2%

Cultural Group

Percent of MN Population

People

(Blank)	<1%	<1%	1%			

<u>Race</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>
American Indian or Alaska Native	1%	1%	1%
Asian	6%	6%	9%
Black or African American	18%	17%	9%
Hawaiian Native/Pacific Islander	<1%	--	--
Two or more races	1%	1%	1%
White	72%	73%	77%
Did not self-identify	2%	2%	3%
(Blank)	<1%	<1%	1%

<u>Primary Impairment</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
Blindness	79%	79%	76%	75.0 (90)
Deaf-Blindness	7%	7%	9%	79.2 (10)
Other visual	14%	13%	15%	75.0 (19)
Other physical	--	--	--	--
(Blank)	<1%	<1%	1%	--

<u>Veteran</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
Veteran	1%	1%	--	--
Not a Veteran	98%	98%	99%	75.3 (119)
(Blank)	1%	1%	1%	--

<u>Age range</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
<u>Less than 18</u>	<u>8%</u>	<u>8%</u>	<u>6%</u>	<u>79.6</u> <u>(6)</u>
<u>18-24</u>	<u>26%</u>	<u>27%</u>	<u>27%</u>	<u>70.7</u> <u>(28)</u>
<u>25-44</u>	<u>32%</u>	<u>32%</u>	<u>25%</u>	<u>75.0</u> <u>(32)</u>
<u>45-54</u>	<u>15%</u>	<u>16%</u>	<u>19%</u>	<u>71.8</u> <u>(25)</u>
<u>55-59</u>	<u>8%</u>	<u>7%</u>	<u>13%</u>	<u>84.4</u> <u>(16)</u>
<u>60 and above</u>	<u>11%</u>	<u>10%</u>	<u>11%</u>	<u>77.7</u> <u>(13)</u>

<u>Education indicated</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
<u>None</u>	<u>1%</u>	<u>1%</u>	<u>1%</u>	<u>--</u>
<u>Less than High School</u>	<u>4%</u>	<u>4%</u>	<u>5%</u>	<u>--</u>
<u>High School</u>	<u>16%</u>	<u>16%</u>	<u>11%</u>	<u>--</u>
<u>High School Diploma/GED</u>	<u>34%</u>	<u>33%</u>	<u>33%</u>	<u>67.7</u> <u>(38)</u>
<u>Vocational School Diploma/Cert</u>	<u>13%</u>	<u>13%</u>	<u>15%</u>	<u>84.5</u> <u>(19)</u>
<u>Associate's Degree</u>	<u>6%</u>	<u>6%</u>	<u>9%</u>	<u>88.5</u> <u>(12)</u>
<u>Bachelor's Degree</u>	<u>15%</u>	<u>15%</u>	<u>12%</u>	<u>79.7</u> <u>(15)</u>
<u>Grad School/Other PostSec License</u>	<u>11%</u>	<u>11%</u>	<u>15%</u>	<u>52.2</u> <u>(20)</u>
<u>Did not identify</u>	<u><1%</u>	<u><1%</u>	<u>1%</u>	<u>--</u>

**2025 SSB Customer Satisfaction Survey Demographic Profile – January
2025 to June 2025**

<u>Gender</u>	<u>Total Population (877)</u>	<u>Valid Population (864)</u>	<u>Survey Respondents (223)</u>	<u>MnCSI (197)</u>
Female	<u>51%</u>	<u>51%</u>	<u>53%</u>	<u>74.0 (106)</u>
Male	<u>49%</u>	<u>49%</u>	<u>46%</u>	<u>71.0 (90)</u>
(Blank)	<u><1%</u>	<u><1%</u>	<u><1%</u>	<u>--</u>

<u>Region</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
Greater MN	<u>29%</u>	<u>29%</u>	<u>26%</u>	<u>69.3 (53)</u>
Metro	<u>71%</u>	<u>71%</u>	<u>73%</u>	<u>74.5 (138)</u>
NULL	<u><1%</u>	<u><1%</u>	<u><1%</u>	<u>64.8 (6)</u>

<u>SSB Status</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
Successful Closure	<u>6%</u>	<u>6%</u>	<u>5%</u>	<u>80.2 (9)</u>
Unsuccessful Closure	<u>4%</u>	<u>4%</u>	<u>3%</u>	<u>68.7 (7)</u>
In-progress	<u>89%</u>	<u>89%</u>	<u>91%</u>	<u>72.4 (179)</u>
(Blank)	<u>1%</u>	<u>1%</u>	<u>1%</u>	<u>--</u>

<u>Ethnicity</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>
Hispanic/Latino	<u>7%</u>	<u>6%</u>	<u>5%</u>
Not Hispanic/Latino	<u>91%</u>	<u>91%</u>	<u>92%</u>
Did not self- identify	<u>2%</u>	<u>2%</u>	<u>2%</u>

(Blank)	<1%	<1%	<1%			

<u>Race</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>
American Indian or Alaska Native	1%	1%	<1%
Asian	5%	5%	5%
Black or African American	19%	19%	13%
Hawaiian Native/Pacific Islander	<1%	<1%	<1%
Two or more races	1%	1%	1%
White	72%	72%	77%
Did not self-identify	2%	2%	2%
(Blank)	<1%	<1%	<1%

<u>Primary Impairment</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
Blindness	82%	81%	79%	72.4 (157)
Deaf-Blindness	6%	6%	8%	79.9 (15)
Other visual	12%	12%	13%	71.2 (25)
Other physical	--	--	--	--
(Blank)	<1%	<1%	<1%	--

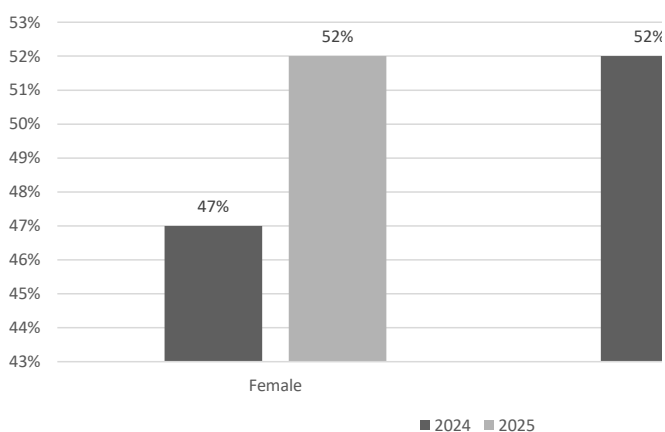
<u>Veteran</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
Veteran	1%	1%	<1%	--
Not a Veteran	98%	98%	99%	72.6 (195)
(Blank)	1%	<1%	1%	--

<u>Age range</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
<u>Less than 18</u>	<u>8%</u>	<u>9%</u>	<u>6%</u>	<u>81.4 (10)</u>
<u>18-24</u>	<u>24%</u>	<u>24%</u>	<u>21%</u>	<u>71.7 (38)</u>
<u>25-44</u>	<u>31%</u>	<u>31%</u>	<u>35%</u>	<u>72.8 (70)</u>
<u>45-54</u>	<u>16%</u>	<u>16%</u>	<u>17%</u>	<u>72.3 (36)</u>
<u>55-59</u>	<u>8%</u>	<u>7%</u>	<u>9%</u>	<u>76.0 (17)</u>
<u>60 and above</u>	<u>12%</u>	<u>12%</u>	<u>13%</u>	<u>69.6 (26)</u>

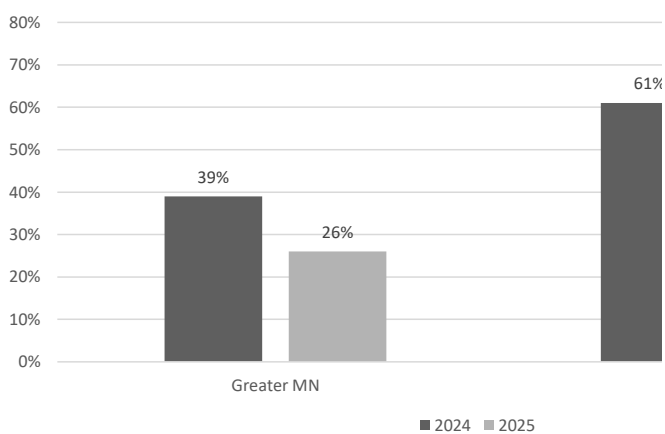
<u>Education indicated</u>	<u>Total Population</u>	<u>Valid Population</u>	<u>Survey Respondents</u>	<u>MnCSI</u>
<u>None</u>	<u>1%</u>	<u>1%</u>	<u><1%</u>	<u>--</u>
<u>Less than High School</u>	<u>3%</u>	<u>3%</u>	<u>3%</u>	<u>--</u>
<u>High School</u>	<u>14%</u>	<u>14%</u>	<u>9%</u>	<u>71.9 (14)</u>
<u>High School Diploma/GED</u>	<u>34%</u>	<u>34%</u>	<u>36%</u>	<u>75.6 (67)</u>
<u>Vocational School Diploma/Cert</u>	<u>10%</u>	<u>10%</u>	<u>10%</u>	<u>68.4 (23)</u>
<u>Associate's Degree</u>	<u>7%</u>	<u>7%</u>	<u>10%</u>	<u>68.5 (21)</u>
<u>Bachelor's Degree</u>	<u>16%</u>	<u>16%</u>	<u>16%</u>	<u>85.4 (32)</u>
<u>Grad School/Other PostSec License</u>	<u>13%</u>	<u>14%</u>	<u>14%</u>	<u>80.7 (30)</u>
<u>Did not identify</u>	<u>1%</u>	<u>1%</u>	<u>1%</u>	<u>--</u>

2024-2025 Response Demographics Comparisons

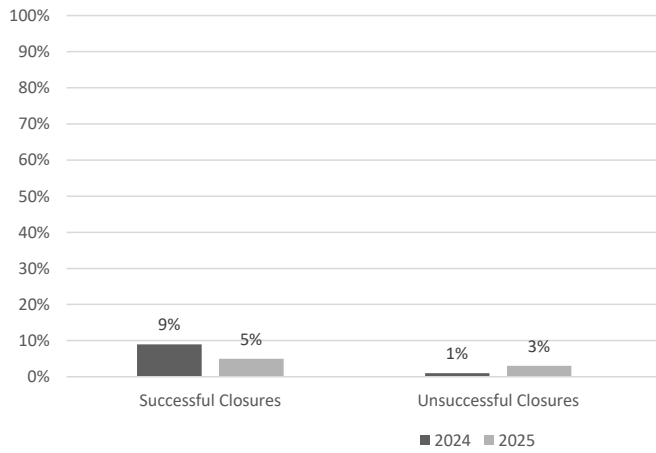
Respondents by Gender



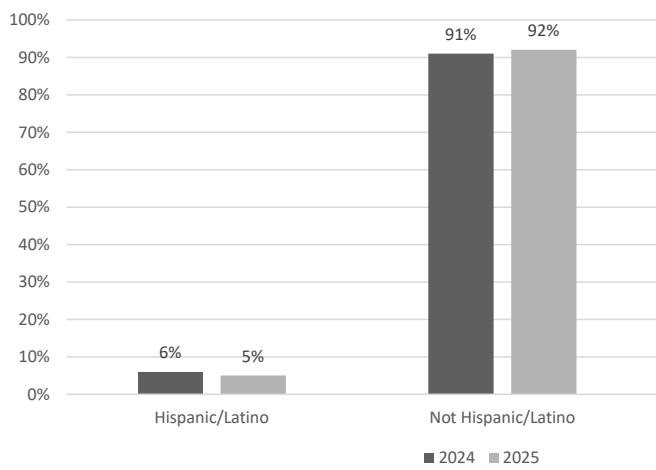
Respondents by Region



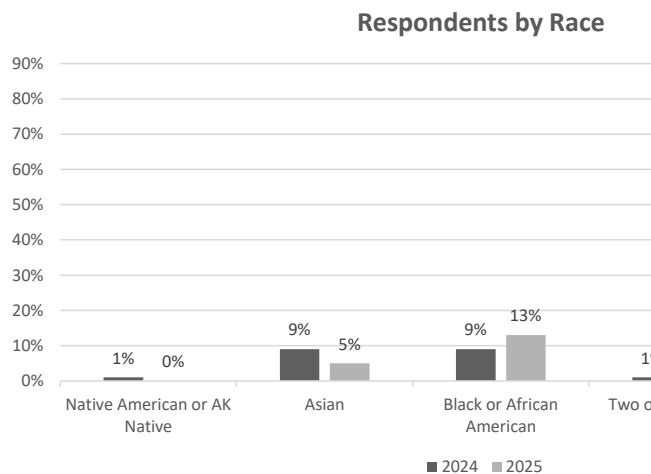
Respondents by Case Status



Respondents by Ethnicity

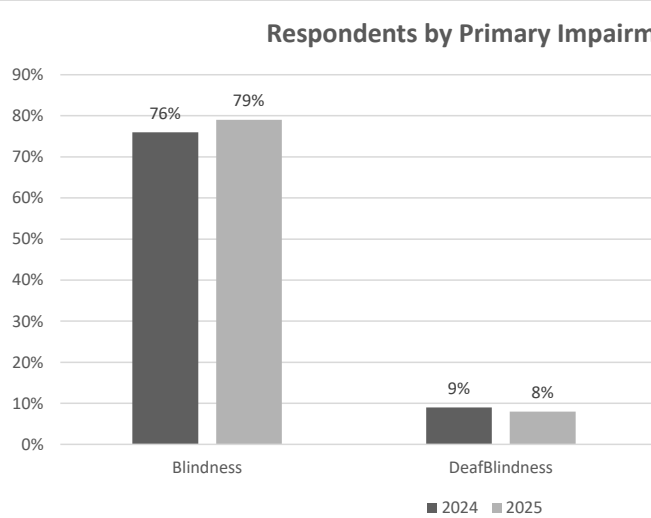


Respondents by Race



Race	2024	2025
Native American or AK Native	1%	0%
Asian	9%	5%
Black or African American	9%	13%
Two or more races	1%	0%

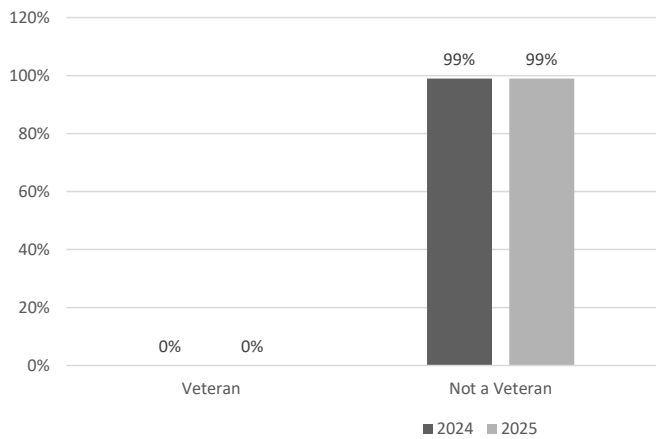
Respondents by Primary Impairment



Primary Impairment	2024	2025
Blindness	76%	79%
DeafBlindness	9%	8%

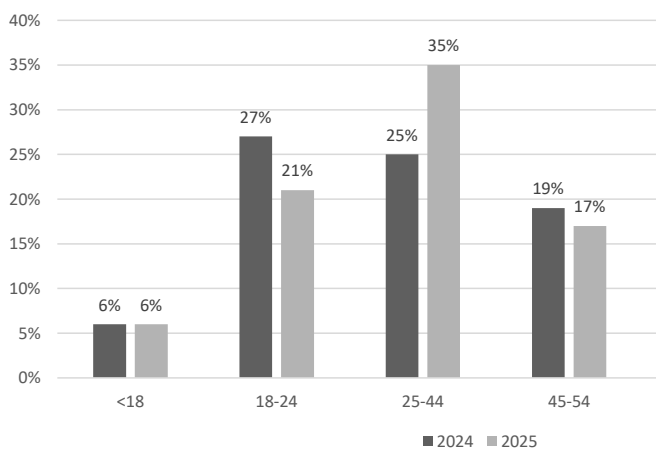
SSB currently serves 54 DeafBlind individuals with another 30 categorized as having a dual sensory loss.

Respondents by Veteran Status



SSB serves a small number of veterans as most individuals receive services through the Veterans Administration. We currently have 9 customers identified as veterans and believe that services are adequate to meet their needs.

Respondents by Age



Respondents by Education <table><caption>Respondents by Education Data</caption><thead><tr><th>Education Level</th><th>2024 (%)</th><th>2025 (%)</th></tr></thead><tbody><tr><td>High School</td><td>5%</td><td>3%</td></tr><tr><td>High School Diploma/GED</td><td>11%</td><td>9%</td></tr><tr><td>Vocational School Diploma/Cert.</td><td>33%</td><td>36%</td></tr><tr><td>Associate's Degree</td><td>15%</td><td>10%</td></tr></tbody></table> Response Rates <table><caption>Response Rates Data</caption><thead><tr><th>Response Method</th><th>2024 (%)</th><th>2025 (%)</th></tr></thead><tbody><tr><td>Email</td><td>20%</td><td>27%</td></tr><tr><td>Other</td><td>7%</td><td>0%</td></tr></tbody></table>		Education Level	2024 (%)	2025 (%)	High School	5%	3%	High School Diploma/GED	11%	9%	Vocational School Diploma/Cert.	33%	36%	Associate's Degree	15%	10%	Response Method	2024 (%)	2025 (%)	Email	20%	27%	Other	7%	0%		
Education Level	2024 (%)	2025 (%)																									
High School	5%	3%																									
High School Diploma/GED	11%	9%																									
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Associate's Degree	15%	10%																									
Response Method	2024 (%)	2025 (%)																									
Email	20%	27%																									
Other	7%	0%																									
Racial or Ethnic Group																											
Other/Multiple Groups	*Multiple Cultural Groups	3.9	216,300																								
Hispanic or Latino	Mexican	3.3	186,800																								

Black or African-Americans	African-Americans	3.2	179,800
Asian	Hmong	1.6	86,600
Black or African-American	Somali	1.4	76,200

With the diversity in cultural groups in Minnesota, there are many languages spoken other than English. The top 5 languages, not including English, spoken in Minnesota are:

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1. Spanish
2. Amharic, Somali, or other Afro-Asiatic Languages
3. Hmong
4. Chinese
5. Vietnamese

It is difficult to get an accurate picture of the incidence of blindness, low vision, and DeafBlindness in Minnesota as there are few sources of data collection and the most recently available is from 2019. The American Foundation for the Blind reported in their 2019 Prevalence Rates of Vision Difficulty, a total of 84,900 individuals. Of that total, 38,265 were male and 46,635 were female. The prevalence rates are broken down by age as follows:

Under 5	1,425
5-17	6,209
18-34	10,466
35-64	29,378
65-74	12,923
75 and older	24,499

2017 Minnesota Joint Disparity Study

The State of Minnesota conducted disparity studies in:

- 1999 (Mason Tilman)
- 2009 (MGT of America)
- 2017 (Keen Independent Research)
 - <https://mn.gov/admin/disparity-study/>

The 2017 Minnesota Joint Disparity Study examines whether discrimination affects minority-owned and women-owned firms in the marketplace and ways to address that discrimination. Although this purpose does not address individuals with disabilities specifically, it can still provide useful information. The Legislature has approved money to conduct an updated study.

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The SRC-B Customer Satisfaction Survey Committee, in coordination with the Department's survey specialist, added a demographic profile to the customer satisfaction survey results. This profile gives us additional information on the customer satisfaction by age, gender, race, ethnicity, geographic area, etc. The MnCSI (Minnesota Customer Satisfaction Index) measures percentage of satisfaction, with a higher number being higher satisfaction. Satisfaction for the most recent 2023 survey was overall higher for individuals who are BIPOC or Hispanic/Latinx.

2023 Customer Satisfaction Survey Demographic Profile

Gender	Total Population (663)	Valid Population (587)	Survey Respondents (186)	MnCSI (154)
Female	48%	48%	53%	77.7 (82)
Male	52%	52%	47%	78.9 (71)

Region	Total Population	Valid Population	Survey Respondents	MnCSI
Greater MN	39%	38%	39%	75.9 (63)
Metre	60%	61%	59%	79.8 (88)
NULL	<1%	1%	2%	81.4 (3)

SSB Status	Total Population	Valid Population	Survey Respondents	MnCSI
Successful Closure	7%	7%	8%	83.6 (15)
Unsuccessful Closure	3%	2%	1%	--
In-progress	88%	89%	90%	77.5 (138)
(Blank)	2%	1%	1%	--

Ethnicity	Total Population	Valid Population	Survey Respondents	MnCSI
Hispanic/Latino	7%	7%	5%	81.4 (8)
Not Hispanic/Latino	91%	91%	92%	78.0 (143)
Did not self-identify	2%	2%	2%	--
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Race	Total Population	Valid Population	Survey Respondents
American Indian or Alaska Native	1%	1%	1%
Asian	5%	5%	6%
Black or African American	20%	19%	12%
Hawaiian Native/Pacific Islander	--	--	--
Two or more races	1%	1%	1%
White	71%	71%	77%

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Did not self-identify	2%	2%	2%
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BIPOC	Total Population	Valid Population	Survey Respondents	MnCSI
Yes	33%	33%	25%	82.7 (37)
No	65%	67%	75%	76.8 (117)
{Blank}	2%	—	—	—

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Primary Impairment	Total Population	Valid Population	Survey Respondents	MnCSI
Blindness	76%	76%	73%	79.5 (110)
Deaf-Blindness	7%	7%	9%	81.4 (12)
Other visual	17%	17%	18%	72.6 (31)
Other physical	—	—	—	—
{Blank}	<1%	<1%	1%	—

Veteran	Total Population	Valid Population	Survey Respondents	MnCSI
Veteran	1%	1%	1%	—
Not a Veteran	98%	98%	98%	78.7 (151)
{Blank}	1%	1%	1%	—

Age range	Total Population	Valid Population	Survey Respondents	MnCSI
Less than 18	9%	9%	7%	69.4 (4)
18-24	25%	26%	26%	84.3 (39)
25-44	32%	33%	30%	74.0 (48)
45-54	16%	16%	19%	81.2 (34)
55-59	8%	7%	6%	70.0 (11)
60 and above	11%	10%	11%	77.5 (18)

Education indicated	Total Population	Valid Population	Survey Respondents	MnCSI
None	1%	1%	1%	—
Less than High School	4%	4%	2%	—

High School	16%	15%	16%	81.7 (17)
High School Diploma/GED	35%	35%	31%	75.0 (48)
Vocational School Diploma/Cert	13%	13%	12%	72.4 (20)
Associate's Degree	6%	6%	8%	73.1 (12)
Bachelor's Degree	15%	15%	16%	84.5 (25)
Grad School/Other PostSec License	11%	11%	15%	64.0 (27)
Did not identify	<1%	<1%	1%	—

In an effort to understand where there are areas of racial disparities within the customers SSB serves, an analysis was conducted by our data analyst consultant, Michael Prideaux, in early October 2023. The analysis examines a series of T Tests to determine if the difference between groups is statistically significant. The factors examined were the percent exiting successfully, exiting unable to locate, and the wage at exit. The analysis included data on participants served in PY 2021 and 2022 for the following pairs:

1. Black-White
2. Asian-White
3. Hispanic/Latinx-White
4. Native American/Alaska Native-White
5. Asian/Pacific Islander-White
6. Multiracial-White
7. Black, Indigenous, People of Color (BIPOC)-White
8. Female-Male

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The analysis's main finding is a statistically significant disparity in the percentage of participants unable to be located between BIPOC participants at large and white participants. This disparity is likely driven by the disparities between black and Hispanic participants and their white counterparts. Wages had no statistically significant disparities, likely due to sample size and the slight difference in wages at exit. Further investigation will be needed to determine the causes of the disparity.

SSB is aware that services for new Americans is an area of continued need. We know that outcomes are not as positive for new Americans and there is a lack of service providers available to meet the needs. In line with the MN Department of Employment and Economic Development (DEED), SSB has an objective to focus on diversity, equity, inclusion, and accessibility, creating an agency that better meets the needs of the current and emerging workforce, including improving services to new Americans, underrepresented communities, and veterans. We've included this objective in our Goals, Priorities, and Strategies and this is in alignment with the WIOA combined State Plan Strategic Vision, Goals and Strategies for the entire state of Minnesota.

SSB serves a small number of veterans as most individuals receive services through the Veterans Administration. We currently have 10 customers identified as veterans and believe that services are adequate to meet their needs.

SSB currently serves 49 DeafBlind individuals with another 26 categorized as having a dual sensory loss.

In 2021, the Minnesota Commission of the Deaf, DeafBlind & Hard of Hearing (MNCDHH) partnered with Wilder Research to conduct a needs assessment and create a data-informed strategic plan, with the goal of better supporting DeafBlind children and youth in Minnesota. The key finding was Minnesota lacks a cohesive system for supporting DeafBlind children and youth. Professionals identified a number of system and practice issues, with the most prominent being a lack of communication and coordination among professionals who serve DeafBlind children and youth including:

- A lack of communication among service providers
- A lack of DeafBlind-specific knowledge and skills among professionals who serve DeafBlind children and youth
- A lack of professional support and guidance for families and loved ones of DeafBlind children and youth

Professionals also reported a piecemeal “system” for serving DeafBlind children and their families that is comprised of slightly coordinated institutions, organizations, and people. Several suggestions for better supporting DeafBlind children and youth in Minnesota were given including:

- Promoting coordinated services and the sharing of information among service providers
- Helping children with combined hearing and vision loss and their families coordinate services
- Providing education about DeafBlindness to parents and providers
- Offering social connection and emotional support for DeafBlind children and youth and their families
- Preparing DeafBlind youth for the transition to community-based services at age 21
- Contributing to legislative and policy-focused activities that could improve the lives of DeafBlind children

SSB has worked to develop more options in service providers specializing in DeafBlindness. A contract has been established with Helen Keller National Center (HKNC) for ATB with the potential for additional services being investigated. Additionally, there has been discussion of growth by potentially hiring providers in the state of Minnesota for service provision and potentially establishing an in-state location for training. An HKNC employment services staff member is acquiring ACRE-certified training to become a Customized Employment provider.

Despite these strides, there continues to be a lack of providers with the knowledge and skills to provide the specialized services needed by DeafBlind individuals and even less so, those that can communicate directly in their language.

SSB continues to see an enormous lack of the availability of Adult Basic Education centers (ABE) that provide ELL services with braille to blind and visually impaired individuals. For many new Americans, learning English is a first step before Adjustment to Blindness (ATB) training, higher education and/or employment, and self-sufficiency. Minnesota has a robust ABE program; however, it is not equipped to serve individuals with visual disabilities. Minnesota's ELL centers/programs are very limited, under-funded, and in need of resources to learn, set up, and provide accommodation, needs, and services to Minnesota's growing blind, visually impaired, and DeafBlind customers needing ELL programs that can provide them the disability accommodations they require to be successful. The unique dual needs of learning ATB skills (adaptive way to access print) while learning beginning level ELL skills is missing from 2 out of the 3 ATB centers offered in Minnesota. The need is great for students to continue learning adaptive daily skills while learning ELL skills. Minnesota should have more ABE centers that are able to provide ELL classes with braille for blind, visually impaired, and DeafBlind students to meet the growing needs.

2- Individuals with disabilities served through other components of the workforce development system; and

Blind, visually impaired, and DeafBlind individuals are served in all components of the workforce development system, both as universal customers and in eligibility-based programs. In Minnesota, we call this system CareerForce, while other states refer to this as the American Job Centers. In Minnesota, universal customers are served by CareerForce partners, including the WIOA Title I and III programs in the local workforce development areas. There are close to 50 CareerForce locations throughout the state offering classes, workshops, pre-employment services, etc. SSB has a presence in 6 CareerForce locations with 10 SSB Workforce Development Unit (WDU) staff officed in CareerForce locations. A small percentage of the individuals who utilize the CareerForce locations are blind, visually impaired, low vision, or DeafBlind. A SSB recent analysis of referrals from CareerForce Centers from Program Year 2024 to 2025 revealed only 1 verified referral. 2020 to 2022 revealed only 2 verified referrals.

Although CareerForce Centers are available and their use is encouraged, many individuals who are blind, visually impaired, low vision, or DeafBlind do not feel comfortable utilizing the CareerForce locations and choose to work with SSB directly. Staff at local CareerForce locations often do not have the training or skills to help with the accessible computer systems. SSB staff are recognized as more knowledgeable in the areas of blindness and accessible technology. SSB's service model is to work directly with individuals in their communities, at the location of their choosing, using the method they prefer (whether in-person or virtual). Rarely do individuals show up at a CareerForce location seeking SSB services. With transportation being a primary barrier for the vast majority of our customers, the "we come to you" approach is more customer centric.

3- D. Youth with disabilities, including students with disabilities and their need for pre-employment transition services. 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 IDEA.

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An important and unique group of possible customers for State Services for the Blind are students and youth with disabilities. This category includes students ages fourteen up until their 22nd birthday eligible, or potentially eligible, for pre-employment transition services, and youth through age twenty-four.

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Minnesota Department of Education (MDE) has indicated in their Unduplicated Child Count report that approximately 253 students were reported in secondary education whose primary disability is blindness or DeafBlindness. Additionally, SSB serves some Pre-ETS students enrolled in postsecondary education programs. Based on our current numbers, we estimate there to be 50 additional postsecondary students, for a total of 303 students.

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“Unduplicated Child Count” report for fiscal year 2023 that there are approximately 248 students in secondary education who are blind, visually impaired, or DeafBlind. This number only includes those students whose primary disability is blindness or DeafBlindness.

Table 1

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Table 1 includes data on the number of Pre-ETS students (Participant and Potentially Eligible) served by SSB in Program Years 2020 through 2024. Overall, we saw a decrease in numbers between 2018 and 2021. Since then, we have started to see a steady increase from 2021 and are now back to our pre-pandemic levels of customers eligible per year and approaching our pre-pandemic numbers of customers served per year. The trend continues for an increasing number of Pre-ETS participants. We believe this is a testament to the adaptability and creativity of our staff who began offering a wide variety of virtual programming. Note that the data is a snapshot in time and actual numbers may vary plus or minus a few students.

Table 1 includes data on the number of Pre-ETS students (Participant and Potentially Eligible) served by SSB in Program Years 2018 through 2022. SSB does not serve a large number of Pre-ETS potentially eligible customers. Overall, we saw a decrease in numbers between 2018 and 2021. Since then, we have started to see a gradual increase from 2021 and are now back to our pre-pandemic levels of customers eligible per year and approaching our pre-pandemic numbers of customers served per year. It is worth noting that in PY2020, although the number served decreased, the number of Pre-ETS participants increased and that trend continues. We believe this is a testament to the adaptability and creativity of our staff who began offering a wide variety of virtual programming. Note that the data is a snapshot in time and actual numbers may vary plus or minus a few students.

	PY2020	PY2021	PY2022	PY2023	PY2024
Number of Individuals Determined Eligible	191	210	260	257	276
Number of Total Participants with an IPE	815	834	847	931	1,051

<u>**Number of Pre-ETS Potentially Eligible Students with a Disability</u>	<u>12</u>	<u>10</u>	<u>10</u>	<u>9</u>	<u>7</u>
<u>Number of Students with a Disability with an IPE</u>	<u>185</u>	<u>188</u>	<u>213</u>	<u>217</u>	<u>205</u>
<u>Number of Youth with a Disability with an IPE***</u>	<u>76</u>	<u>77</u>	<u>84</u>	<u>79</u>	<u>76</u>

	PY2018	PY2019	PY2020	PY2021	PY2022
Number of Individuals Determined Eligible	224	176	191	210	260
Number of Total Participants With an IPE	913	870	815	834	847
<u>**Number of Pre-ETS Potentially Eligible Students with a Disability</u>	<u>12</u>	<u>17</u>	<u>12</u>	<u>10</u>	<u>10</u>
<u>Number of Students with a Disability With an IPE</u>	<u>177</u>	<u>177</u>	<u>185</u>	<u>188</u>	<u>213</u>
<u>Number of Youth with a Disability With an IPE***</u>	<u>107</u>	<u>97</u>	<u>76</u>	<u>77</u>	<u>84</u>

**Pre-ETS Potentially Eligible per year total includes any individual who was in the Pre-ETS referral status at any point during the year.

***Number of Youth with a Disability with an IPE does not include students already counted under Number of Students with a Disability with an IPE.

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Table 2

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The data in Table 2 provides the percentage of customers who were served in each Pre-ETS Category by Potentially Eligible and Participants (Pre-ETS only) in ~~FFY23~~FFY25.

<u>Pre-ETS Service Category</u>	<u>Potentially Eligible</u>	<u>Participants (Pre-ETS only)</u>	<u>Participants (Pre-ETS + Potentially Eligible)</u>
<u>Instruction in Self-Advocacy</u>	<u>67%</u>	<u>64%</u>	<u>65%</u>
<u>Job Exploration Counseling</u>	<u>44%</u>	<u>44%</u>	<u>44%</u>
<u>Post Secondary Counseling</u>	<u>33%</u>	<u>44%</u>	<u>44%</u>

Work-Based Learning	22%	51%	50%
Workplace Readiness Training	67%	55%	55%
Total All Students	53%	52%	51%

Pre-ETS Service Category	Potentially Eligible	Participants (Pre-ETS only)	Participants (Pre-ETS + Potentially Eligible)
Instruction in Self-Advocacy	25%	44%	43%
Job Exploration Counseling	50%	42%	41%
Post-Secondary Counseling	50%	42%	41%
Work-Based Learning	13%	38%	37%
Workplace Readiness Training	38%	49%	48%
Total All Students	63%	79%	78%

Table 3

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From the data in Table 3, of the dollars spent in ~~FY2023~~ ~~FY2025~~ in each Pre-ETS category by potentially eligible and participants, participant expenditures for Work-Based Learning, and Workplace Readiness Training activities constitute the majority of our spending, closely followed by Job Exploration Counseling.

Pre-ETS Service Category	Potentially Eligible	Participants	Totals
Instruction in Self-Advocacy	\$0	\$16,411.95	\$16,411.95
Job Exploration Counseling	\$0	\$60,247.88	\$60,247.88
Post Secondary Counseling	\$0	\$1,950.00	\$1,950.00

Work-Based Learning	\$0	\$81,310.55	\$81,310.55
Workplace Readiness Training	\$8,360.00	\$197,095.33	\$205,455.33
Total All Students	\$8,360.00	\$357,015.71	\$365,375.71

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Pre-ETS Service Category	Potentially Eligible	Participants	Totals
Instruction in Self-Advocacy	\$0	\$4,599.8	\$4,599.8
Job Exploration Counseling	\$0	\$7,276.52	\$7,276.52
Post-Secondary Counseling	\$0	\$516.83	\$516.83
Work-Based Learning	\$0	\$59,546.54	\$59,546.54
Workplace Readiness Training	\$1,632.58	\$219,321.86	\$220,954.44
Total All Students	\$1,632.58	\$286,661.75	\$288,294.33

****Table 3

Note that while SSB spent \$0 on four of the Pre-ETS categories for potentially eligible, this does not mean these services are not offered or provided. Instruction in Self-Advocacy, Job Exploration Counseling, and Post-Secondary Counseling are provided by our Pre-ETS team and not typically purchased through a community partner. For example, staff facilitate individual activities related to disability disclosure, interest inventories and labor market investigation, and post-secondary preparation. Work-based learning is offered and available to potentially eligible students; however, many students require additional services to participate in those experiences. Some of these services can only be provided when a student has an Individualized Plan for Employment (IPE). Therefore, these students often decide to apply for services. For potentially eligible students who want to pursue a work experience, SSB has two in-house work opportunity navigators, and two job coaches, and a new Multiple Systems and Pathways Navigator all of whom provide these services to potentially eligible and eligible students. In those situations, we would not have a dollar amount attached as we did not procure those services through a third party. Additionally, instruction in self-advocacy is often offered as a service to groups which potentially eligible students are able to participate in, therefore the amount shown in the table does not accurately reflect the amount SSB spent on that service for participants or potentially eligible students.

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Assessments

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SSB developed a Pre-ETS student self-assessment which gives an opportunity for students to share their understanding of their preparedness for college, careers, and work in relation to the Pre-ETS categories. With this student self-assessment, the results provide two key pieces of information:

1. The results indicate where the student believes their strengths and weaknesses are and thus provide a sense of direction for staff to validate the student's strengths and work towards improving the weak areas.
2. The self-assessment can be used as a post-assessment when administered a second time. This allows students and team members to see the student's growth as a result of having received Pre-ETS. The results will demonstrate if the methodologies were effective or if service delivery has room for improvement.

The self-assessment may be facilitated by SSB staff, teachers, providers, or completed independently by students with the results compiled by SSB. It can be provided to both potentially eligible and eligible students.

The self-assessment serves as a powerful tool to help guide both students and team members in which area or service to focus on, as well as track learning progress. This assessment is delivered on a case-by-case basis and used as appropriate. IEP team members, parents, and other supports can assist with the process when deemed appropriate by the team. SSB staff are required to complete a comprehensive assessment before IPE development. This assessment reinforces the necessity for counselors to consider IEP goals within this assessment and address areas of need as best fit.

~~SSB staff are required to complete a comprehensive assessment before IPE development. This assessment reinforces the necessity for counselors to consider IEP goals within this assessment and address areas of need as best fit.~~

Counselors are required to address all five core Pre-ETS areas within this assessment and note all of the services an eligible student requires to make progress toward an employment goal or projected goal.

For potentially eligible students, a similar assessment is completed to determine which of the five core Pre-ETS the student would require. Ongoing assessment and review ~~is~~ are conducted to determine any additional Pre-ETS the student would need or which Pre-ETS have concluded. Assessing Pre-ETS needs using a continuum assessment are part of students' annual IPE review.

Every high school student is eligible to engage in SSB's in-house assessments for assistive technology, orientation and mobility, and independent living needs that are critical for success.

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These assessments are required for seniors in high school as they plan to ~~transition-shift~~ into activities beyond secondary education. Training is then coordinated in relation to the needs displayed in the assessment with education officials and other team members as appropriate.

Coordinating to determine needs

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When invited, SSB staff attend IEP and IEP 3-year evaluation meetings and collect these documents for review to coordinate with team members and provide services in collaboration with IDEA. SSB staff work with students and their families, IEP case managers, teachers of the blind and visually impaired, orientation and mobility specialists, and other IEP team members to supplement services provided by IDEA in order to assist with goal acquisition. SSB is able to provide additional activities outside of the classroom and school day through in-house service provision and community partners to strengthen and reinforce IEP goals needed for high school success and preparedness for the workplace. SSB staff consult with IEP members when providing additional activities that supplement IEP activities and align with IPE goals to ensure understanding of instruction from both agencies.

SSB's Pre-ETS and Transition Coordinator attends Statewide Vision Network meetings hosted by the specialist for the blind/visually impaired (BVI) with the Department of Education to stay engaged and up to date on BVI instruction throughout the state. They sit on the BVI Advisory Committee to collaborate and develop additional opportunities for students in and out of the classroom. The Pre-ETS and Transition Coordinator and other SSB staff, as appropriate, also attend the annual Minnesota Division on Vision Impairments TBVI and COMS Conference in the fall every year to network and collaborate with teachers statewide.

Identified needs and how they are being addressed

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SSB has identified three gaps that need to be filled; these gaps were identified in previous needs assessments and are still ongoing needs:

1. Students being unprepared for post-secondary training.
2. Spending the 15% set aside.
3. Services for students who have multiple challenges.

As is generally the case, identifying gaps does not imply that nothing is currently being done in these areas. Rather, the intent here is to indicate that the need for more attention is a priority. SSB has developed contracts with various community partners to help assess Pre-ETS ~~and transition~~ needs while providing innovative transition programming to address those needs. SSB's Pre-ETS ~~and transition~~ staff has also expanded to ensure needs are assessed and addressed.

SSB has expanded its Pre-ETS ~~and transition~~ staff to ensure it continues to meet the needs of students throughout the state and make certain that our work is managed under consistent supervision. A Pre-ETS ~~and Transition~~ Program Manager was hired to manage the Pre-ETS

budget, contracts, and policy, as well as supervise the Pre-ETS and transition direct service staff. A second Work Opportunities Navigator located in Greater Minnesota, and available to deliver the five core Pre-ETS to all students, was also added. Additionally, SSB hired a Multiple Systems and Pathways Navigator, who is responsible for helping students with the most significant of disabilities and their families navigate the complex federal, state, and local services and resources as they move from school to work. SSB is in the process of hiring a Multiple Systems and Pathways Coordinator, who will be responsible for helping students with the most significant of disabilities and their families navigate the complex federal, state, and local services and resources to transition from school to work.

These 3 new staff comprise the complement of 1 Pre-ETS and Transition Manager, 1 Pre-ETS and Transition Coordinator, 2 Work Opportunities Navigators, 3 dedicated Pre-ETS and Transition counselors in the seven-county metro area, and 1 dedicated Pre-ETS Assistive Technology Specialist. All counselors outside of the metro area serve both students and adults.

In addition to the roles mentioned above, we have staffed positions for orientation and mobility training, job coaching, and rehabilitation teaching that are available to students. SSB has 1 employment specialist who specializes in working with DeafBlind Pre-ETS students.

SSB has a continued need for additional service providers and allows applications for contracts through the Request For Proposal (RFP) process, as SSB continues to seek out impactful opportunities for students to engage in local and national organizations.

The COVID-19 pandemic has brought about additional community partners to provide Pre-ETS virtually in ways that had not been options before. Virtual work-based learning experiences are offered through ReSOURCE/LEAP, a community partner out of Vermont. They provide opportunities for students to engage in hands-on work experiences where students actively engage in pre-employment transition skill building including career mentorship, communication, teamwork, problem-solving, professionalism, time management, goal setting, leadership, and more. They also offer workplace readiness training in various areas to help low vision, blind, and DeafBlind students build valuable skills needed for the workforce.

SSB has contracted with the local nonprofit Wilderness Inquiry. They have partnered with SSB to provide outdoor education and experiences while instructing on self-advocacy and workplace readiness training. As of the fall of ~~2023~~2025, two summer canoe trips have been coordinated, plus a winter activity for students to engage in self-advocacy instruction, and future peer mentoring opportunities are being discussed.

~~SSB has contracted with Envision Foundation for their all-virtual College Success Program (formerly offered through Learning Ally). The all-virtual College Success Program offers a holistic support system that utilizes the knowledge and experience of experts in the blindness field as well as blind or visually impaired college graduates to help guide students as they transition from high school to college and employment. This support system includes:~~

- ~~Resources—robust, carefully crafted, and designed to address situations encountered by blind or visually impaired college students.~~
- ~~Mentorship—mentors, who are recent college graduates and are blind or visually impaired themselves, help their mentees navigate college experiences including a job hunt that is unique to them, and provide them with as much or as little support as they'd like.~~
- ~~Meetups—held virtually, these meetups are opportunities for students to connect with their peers to talk about issues, ask questions, network, make connections, and more.~~
- ~~Audiobook Solution—College Success Program membership includes access to Learning Ally's Audiobook Solution with over 80,000 human-read audiobooks.~~

Sky's The Limit Communications is contracted with SSB. This Community Partner provides Sky's The Limit Communications through David DeNotaris is contracted with SSB. David and his partner Eileen Rivera Ley provided two days of instruction in self-advocacy and personal finance with SSB students in June of 2023 and more trainings are planned. This contract provides both virtual and in-person Pre-ETS training in four of the five required areas. This contract affords both virtual and in-person Pre-ETS in four of the five required areas. This flexibility allows SSB to bridge some of the gaps in delivering services in greater Minnesota through virtual programming, as students in rural areas frequently miss out on programming held in the Twin Cities.

SSB contracts with Penny Forward, an organization that provides financial literacy training as well as benefits planning. Both individual and group offerings allow students to connect with this partner to learn about activities essential for their future financial planning.

Vanward Consulting Services also partners with SSB to offer students opportunities in job exploration counseling, workplace readiness training, and work-based learning opportunities.

SSB recently developed a contract with Perkins School for the Blind that will allow aspiring college students to engage in their College Success Compass Program to work on college preparedness and valuable workplace readiness skills. Vanward Consulting Services will also partner with SSB to offer students opportunities in job exploration counseling, workplace readiness training, and work-based learning opportunities.

SSB's Pre-ETS ~~and transition~~ team has created an ambassador program to enhance opportunities for self-advocacy instruction and peer mentoring opportunities. Staff realize how important mentorship opportunities are for students and how students connect and develop friendships across the state when events take place that bring students together. The objective of this program is to bring students together more frequently to increase opportunities for them to connect and learn from each other. Mentors will be supported through the SSB Pre-ETS ~~and transition~~ team, and these students will also help with ~~recruiting efforts~~ generating ideas for programming. SSB recognizes that students are more likely to engage in programming when they know others who are attending or are invited by their peers versus counselors and other SSB staff.

The Summer Transition Program (STP), a joint collaboration between the Minnesota Department of Education, Local Education Agencies, and SSB, is a program for students who are entering their last or second to last year of high school and have extended school year services identified in their IEP. This is typically a two-week residential program held at the University of St. Thomas in St. Paul MN, where students engage in a variety of training that aligns with their IEP and IPE goals, hitting all five required Pre-ETS areas. ~~STP returned to in-person the summer of 2022 after hiatus due to the COVID-19 pandemic.~~ Skills are assessed by the IEP team (including vocational rehabilitation counselors), and this program is recommended for those with goals that align with this training opportunity.

Students will participate in STP, work on their IEP goals, and engage in additional training important for success in the community. Students are offered to work with SSB's Work Opportunities Navigators to participate in a work-based learning experience following the residential completion of STP. For the summer of ~~2022~~2025, there were ~~17~~24 students registered ~~and 20 were registered for the summer of 2023~~for the program.

To meet the identified needs for youth and students with disabilities, SSB plans to continue offering a wide variety of activities to help them prepare for competitive integrated employment. Some of these activities include:

- Sponsoring adjustment to blindness training or workplace readiness training offered in-house and through community partners.
- Hosting the annual College 101 event, where current and former low-vision, blind, and DeafBlind students form a panel and discuss their experiences in post-secondary with aspiring college students and parents.
- Resuming the SSB career fair previously held every other year. This will be a ~~social~~ networking event where low vision, blind, and DeafBlind individuals in the workforce come together and offer their experiences and mentorship to high school students with vision loss.
- Collaborating with ~~the University of Minnesota~~ a college or university to host a post-secondary assistive technology workshop in the spring of ~~2024~~2026. This will be for aspiring and current college students to learn about assistive technology skills needed for success in higher education.

Another challenge is spending the 15% set aside. SSB continues to identify, develop, and implement creative effective approaches to spending this money. Despite the development of some very innovative programs, it is a struggle to spend all the dollars due to the relatively small number of Pre-ETS students. While each year, we have successfully met (and somewhat exceeded) our 15% requirement both as an agency and a state, we know we have to continue to monitor our budget carefully to ensure we continue to meet the requirement.

To accurately outline and address solutions for the concerns highlighted above, SSB continues to develop a yearly Pre-ETS Blueprint using the framework put into place by WIOA. The Pre-ETS Blueprint outlines SSB's plans to address the five required activities and nine authorized activities as mandated by WIOA. It outlines our set-aside forecasting formula, which allows for us to offer authorized activities in addition to those required.

The third gap in services relates to students who have multiple challenges. These students may not initially be referred to SSB since their primary disability may create more barriers than vision loss. Once they are connected with SSB, the programs might not fit their individual needs. Because our expertise is in blindness rather than other disabilities, we need to seek partners who can augment the programs with support for those students.

SSB is involved in the E1MN partnership that was launched on July 1st, 2021. E1MN is Minnesota's state partnership dedicated to advancing employment-first outcomes for youth and adults with disabilities. This partnership evolved from Minnesota's Employment First policy adopted by the Olmstead Subcabinet in 2014. E1MN is led by the State of Minnesota Departments of Education (MDE) Career and Technical Education, and Special Education Unit, Employment and Economic Development (DEED) Vocational Rehabilitation Services (VRS) and State Services for the Blind (SSB) Divisions, and Human Services (DHS) Disability Services Division (DSD). SSB serves a very small number of customers through this partnership compared to VRS due to the low incidence of blindness, or blindness not being the primary disability.

DEED entered into a Memorandum of Understanding with DHS, DSD on July 1, 2021, and continues to be involved in interagency work for the E1MN partnership to ensure individuals receiving Medicaid waiver services and vocational rehabilitation services have seamless employment service delivery to achieve competitive integrated employment. MDE is also present for this work focusing on ~~transition~~ Pre-ETS students to develop education and training, as well as resources for students and their families, vocational rehabilitation staff, schools and educators, and team members at DHS supporting students with disabilities preparing for and entering employment.

SSB's new Multiple Systems and Pathways Navigator position will be dedicated to working with students with multiple and/or complex needs. This position will assist with the coordination of various agencies and systems these students can utilize to achieve their employment, independent living, and recreational and leisure goals. Work in this area will ensure SSB follows Minnesota's Employment First policy and is grounded in person-centered principles. This policy is included in Minnesota's Olmstead Plan and envisions a future where all people with disabilities can achieve competitive integrated employment.

~~In summary, there are three identified gaps related to students and youth with disabilities. They are:~~

- ~~◆ Students being unprepared for post-secondary training~~
- ~~◆ Dealing with the challenges of allocating and effectively spending 15% of federal dollars~~
- ~~◆ Better serving students with multiple challenges~~

-Additionally, we face challenges from a lack of community partners to provide services, especially in greater Minnesota. Our state contracting requirements make it difficult to bring in programs that would contribute to spending our 15% set aside and promote new community providers who desire contracting with us, potentially outside the Twin Cities. Minnesota State

Services for the Blind is already aware of these gaps and is working on addressing them. We are striving to gain a better understanding of these efforts in the next cycle of this process.

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

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In July 2025, the SRC-B's Needs Assessment Taskforce held 3 listening sessions to gather feedback from SSB customers and the community at large. Listening session 1 was for general audience Pre-ETS and adults. Session 2 was for DeafBlind adults. Session 3 was for DeafBlind Pre-ETS. An additional 4th session was added upon request from the Minnesota Speaking DeafBlind group. A final report was drafted based upon feedback received at the listening sessions. The listening session recommendations along with results from the 2025 Customer Satisfaction Survey provide the basis upon which the 2026-27 Goals and Priorities were established.

Report:

**State Services for the Blind – Consumer Listening Sessions 1–3
Needs Assessment Overview**

Purpose

This report compiles feedback from three consumer listening sessions conducted to assess the effectiveness, accessibility, and responsiveness of services provided by State Services for the Blind (SSB). Participants included individuals with diverse experiences navigating vision loss and engaging with SSB programs.

Key Findings

1. Consumer Choice and Autonomy

- Consumers want more freedom to select service providers and training programs.
- Restrictions on approved vendors (e.g., Blind Inc.) limit access to preferred options.

2. Training and Technology Access

- Long delays between intake and training start hinder progress.
- Consumers need training across multiple platforms (Zoom, Teams, Google Suite).
- Rapid tech evolution requires ongoing counselor training and support.
- Traditional skills (Braille, O&M) remain essential alongside tech tools.

3. Employment and Career Support

- Career success often occurs despite—not because of—system support.
- Self-employment and entrepreneurship are under-supported.
- Consumers need better job placement and employer engagement.
- Mid-life career transitions due to vision loss require tailored support.

4. Transportation Challenges

- Transportation is a major barrier, especially in rural areas.
- Public transit is often inaccessible or unreliable.
- Safety concerns with scooters and sidewalk navigation persist.
- Consumers are interested in future solutions like autonomous vehicles.

5. Emotional and Peer Support

- Emotional support is largely absent from SSB services.
- Consumers rely on external resources and informal networks.
- Strong interest in peer mentorship, support groups, and recreational programming.

6. Communication and Navigation

- Consumers want clearer, more proactive communication from SSB.
- Frustration with confusing paperwork and lack of follow-up is common.
- Service pathways need simplification and transparency.

Recommendations

- **Expand Provider Options:** Broaden access to training vendors and hybrid models.
- **Accelerate Access:** Reduce wait times and decentralize metro-centric services.
- **Enhance Counselor Expertise:** Ensure fluency in assistive tech and problem-solving.
- **Support Employment Flexibility:** Streamline self-employment approvals and job placement.
- **Integrate Emotional Support:** Add counseling and peer networks to programming.
- **Improve Communication:** Offer consistent updates and simplify service navigation.
- **Embrace Innovation:** Pilot emerging technologies and accessibility tools.

In 2024, SSB completed construction on a new in-house training kitchen and laundry area at the 2200 University Ave headquarters in St. Paul. Two SSB in-house trainers hold regularly scheduled Adjustment to Blindness training sessions. This in-house training space provides a safe, neutral location and is accessible by public transit. The space is large enough to conduct group lessons. Training sessions are related to independence in the home and community, including braille instruction, safe cooking, cleaning techniques, laundry, simple sewing, and product identification.

In 2024, facilities improvements were made to the St. Paul home office to allow for hybrid meetings in 5 separate conference room sites. This has provided flexibility in access to staff meetings and council meetings. Additionally, this technology can be used to provide hybrid service delivery particularly to customers in rural areas where transportation is a huge barrier.

State Services for the Blind operates as the Designated State Unit in Minnesota, with the Department of Employment and Economic Development as the Designated State Agency.

~~Due to circumstances within the State and consistent with the requirements of 34 CFR 361.29(a)(1)(ii), SSB has determined it necessary to engage in activities to establish, develop, or improve facilities for community rehabilitation programs (CRPs) (hereinafter "establishment projects") in the State for the purpose of providing vocational rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services (Pre-ETS) to students with disabilities who are eligible or potentially eligible for the VR program. In assessing the need for establishment projects in the State, SSB has determined it may be necessary to incur capital expenditures to acquire equipment or improve the field offices of SSB, which satisfy the definition of a CRP at 34 CFR 361.5(c)(8). These expenditures will ensure the continuity of quality service delivery to individuals with disabilities seeking to receive services under the VR program. The State assures it will submit requests for prior written approval to RSA for those costs that exceed the capital expenditure threshold applicable to the State, or for any capital improvements necessary to ready the space for its intended use under the VR program, consistent with requirements set forth in 2 CFR part 200.~~

The availability of community partners (the term used by Vocational Rehabilitation Services and State Services for the Blind in place of "vendors") varies by service and location within the state. There are currently over 30 total community partners that SSB contracts with that provide Adjustment To Blindness (ATB) and Employment-Related services. Currently, Minnesota has 2 facilities that offer comprehensive ATB training with an optional residential component; for purposes of this document, we refer to them as "community rehabilitation programs". A third facility is beginning to build a business model with limited services offered at this time.

~~For twenty-plus years, Minnesota has had three facilities that offer comprehensive ATB training with an optional residential component; for purposes of this document, we refer to them as "community rehabilitation programs". In January 2024, one of those comprehensive ATB facilities closed its doors for an undetermined amount of time during a reorganization and another has discontinued their residential component.~~

State Rule allows SSB to utilize the master contracts Vocational Rehabilitation Services (VRS) have developed with community partners as well. This allows SSB customers more service providers to choose from, which is especially needed in greater Minnesota, where there are fewer choices. ATB community partners in rural Minnesota are becoming more difficult to access; providers have retired or otherwise left the industry, or they have limited flexibility with scheduling during non-business hours.

With the greater emphasis being placed on transition aged youth, the need for more ~~transition~~ Pre-ETS programs has been identified. Contracts have been developed with seven community partners to provide Pre-ETS ~~and transition~~ programs to students. These services are meant to augment work done by school districts with activities on evenings, weekends, and summer breaks. Since October 2015, SSB has contracted with two Adjustment to Blindness training centers to provide ~~transition~~ Pre-ETS programs to students. Since October 2019, a third center began offering a modified version of their full/part time comprehensive Adjustment to Blindness training program to better serve students. By having an SSB staff member dedicated

to community partner relations, we have strengthened our communication, training, and working relations with our community partners.

With our most recent contracting cycle, which began July 1, 2022, we increased our outreach and trainings efforts to encourage all current and new community partners to include Pre-ETS and transition related services as appropriate. All contracted offerings are reviewed annually to ensure that they continue to meet the needs of the students and are adjusted accordingly.

There is an ongoing need to improve employment outcomes for customers who are Deafblind and those with Dual Sensory loss. SSB has also been working to increase service providers that can provide services to our DeafBlind customers. We have recently developed a contract with the Helen Keller National Center (HKNC) for ATB and Employment-Related services, and they are exploring the possibility of an in-state training center. This need was identified when we evaluated the gaps in services for individuals who are DeafBlind, a group we consider having the most significant of disabilities. There are no local programs available that offer adjustment to DeafBlindness training by staff who are fluent in ASL. Training that is available requires extensive use of interpreters, which has resulted in less-than-optimal training for individuals. The only option currently available is to send individuals to HKNC in New York. Many individuals do not want to leave their home communities and families. We serve approximately 50-70 DeafBlind individuals each year in the VR program and hundreds more in the Older Blind program, though there are dozens of additional individuals who have both a hearing and vision loss but do not identify as DeafBlind.

SSB is experiencing a reduction in the amount of Orientation and Mobility instructors available. We have had a couple retire and one leave us for employment in another state. Although we have an incoming contract, there is not enough potential new community partners to meet our needs. SSB will need to recruit new qualified O&M instructors and will be looking at ways to offer incentives. SSB has also been working to increase service providers that can provide services to our DeafBlind customers. We have recently developed a contract with the Helen Keller National Center for ATB and Employment-Related services, and they are exploring the possibility of an in-state training center. This need was identified when we evaluated the gaps in services for individuals who are DeafBlind, a group we consider having the most significant of disabilities. There are no local programs available that offer adjustment to deafblindness training by staff who are fluent in ASL. Training that is available requires extensive use off interpreters, which has resulted in less than optimal training for individuals. The only option available is to send individuals to New York. Many individuals do not want to leave their home communities and families. We serve approximately 50-70 deafblind individuals each year in the VR program and hundreds more in the Older Blind program, though there are dozens of additional individuals who have both a hearing and vision loss but do not identify as deafblind. Most recent Current numbers indicate:

- Numbers Currently Served- 73-84
- DeafBlind- 52-54
- Dual Sensory- 24-30
- Pre-ETS- 24-21 vs.
- Adults- 49-63
- Metro- 51-57 vs.
- Greater MN- 22-27

The tables below measure job outcomes and employment stability among SSB's DeafBlind-Dual Sensory customers.

DeafBlind Successful Outcomes:

Row Labels	Successful Outcome	Unsuccessful Outcome	Grand Total
PY2024	7	8	15
Greater MN	0	2	2
Metro	7	6	13
PY2025 (YTD)	2	9	11
Greater MN	1	5	6
Metro	1	4	5
Grand Total	9	17	26

DeafBlind PY2025 (YTD) Employment – Stable and Not Stable:

Row Labels	Greater MN	Metro	Grand Total
In Employment - Not Stable	1	1	2
Employed <90 Days	1	0	1
Grand Total	2	1	3

SSB experienced an increased demand for Orientation and Mobility (O & M) instruction. In 2024 and 2025, SSB filled two O & M instructor positions. These staff, along with community partners have begun to alleviate the backlog of O&M training with customers.

Due to an almost 25% decrease in adjustment to blindness service providers since COVID, Minnesota Blind SSB has been hiring their own in-house staff to provide some of those services. Specifically, we have hired two rehabilitation teachers, one for the VR program and one for the Older Blind program. Rehabilitation teachers provide training in all things related to independence in the home and community, including product identification, safe cooking, and cleaning techniques, etc.

While our rehabilitation teachers do go into people's homes, there is also a need to have our own rehabilitation teaching space at SSB, which would allow for a safe, neutral location and conducting group lessons. This space could also be used by our service providers for the same purpose. In the past, we could use space offered by community centers, churches, libraries, etc. Since the advent of COVID-19, most places have become restrictive and limit the number of additional people in their buildings.

In addition, as a result of the pandemic, a large shift was made towards a hybrid service delivery model. This means offering services through a variety of methods, including virtual. Many of our meetings and trainings with customers, community partners, and council members are either virtual or a combination of virtual and in-person. Our current infrastructure at our 2200 University headquarters does not allow for accessible hybrid meetings, which means our customers and partners do not have as much flexibility in their ability to choose how they receive their services. This means we need to make improvements to our building to allow for flexibility in service delivery, including improving the technology in our conference rooms and making any further adjustments and improvements to the space. Our customer service survey results shows that customers are overwhelmingly satisfied with being able to receive hybrid and virtual services, as transportation is a huge barrier for them.

(c) Goals, Priorities, and Strategies. Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State’s performance under the performance accountability measures of section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC, and findings and recommendations from monitoring activities conducted under section 107 of the Rehabilitation Act. VR agencies must—

(1) Describe how the SRC-B and the VR agency jointly developed and agreed to the goals and priorities and any revisions;

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The SRC-B has a standing “Customer Satisfaction and Goals & Priorities Committee” which reviews and makes recommendations regarding customer satisfaction, goals and priorities, and VR effectiveness. The committee reports quarterly to the full SRC-B. In preparing the strategies for the goals and priorities, the SRC-B committees are asked to submit their recommendations to SSB. SSB and the Customer Satisfaction and Goals & Priorities Committee jointly developed goals and priorities for the program year 2026.

~~In 2023, there were no recommendations from the committees to review, and SSB and the Customer Satisfaction and Goals & Priorities Committee jointly developed goals and priorities for the program year 2024.~~

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(2) Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—

- (A) **Support innovation and expansion activities.**
- (B) **Overcome barriers to accessing VR and supported employment services.**
- (C) **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); and
- (D) Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.
[text box: List and number each goal/priority, noting the basis, and under each goal/priority list and number the strategies to achieve the goal/priority]

The following goals and priorities are established to guide our work in the listed areas. They mirror the overall State Plan vision, goals, and strategies. We recognize that measuring progress and outcomes are essential to knowing how we are doing and what to adjust along the way. Each area will have multiple staff assignments who will determine what measures to apply, so ongoing final reports clearly show results. Quarterly meetings with SSB staff will be set to measure ongoing progress for each goal.

The goals and strategies for Program Year 2026 reflect what customers and partners shared through the annual Customer Satisfaction Survey and the 2025 Needs Assessment Listening Sessions. They build on progress made in recent years while addressing areas where customers still want improvement—especially communication, timeliness, and equitable access to services.

and stakeholder participants who will determine what measures to apply, so ongoing final reports clearly show results.

GOAL 1: ENHANCE CUSTOMER AND COUNSELOR COMMUNICATION AND FOLLOW-THROUGH

Customers emphasized the importance of consistent updates, clear communication, and reliable follow-through. Some described delays or confusion about who to contact when their counselor was unavailable. Strengthening communication will help customers stay engaged and confident in the process.

STRATEGIES:

- Increase supervisory attentiveness to consistent follow-up and case status communication from counselors without relying only on survey data.
- During prolonged staff absences, ensure regular touchpoints with customers from a consistent alternate contact.
- Simplify paperwork and service navigation tools, especially in the broad adoption of accessible e-signatures as a first mechanism for approval from customers and Community Partners.

GOAL 2: IMPROVE ACCESS TO SERVICES AND TRAINING

Many customers said it took too long to receive training, technology, or equipment. Reducing wait times and expanding flexible learning options will make services more responsive and accessible across the state, including in rural areas.

STRATEGIES:

- Streamline internal approval and purchasing processes to shorten delays.

- Incentivize and encourage utilization of Community Partners to increase both in-person and virtual training opportunities.
- Reduce confusion among staff about the quick referrals and ability to use Community Partners to provide services in addition to in-house staff.
- Expand outreach in rural areas and explore mobile or hybrid training models.
- Ensure equitable service availability across regions, especially rural areas

Goal 3: Broaden Service Options and Consumer Choice

Customers want more flexibility in choosing providers and a clearer understanding of what services are available. Greater transparency and choice help people tailor services to their goals.

STRATEGIES:

- Expand the list of approved training and service providers.
- Support models that combine community-based and online services.
- Provide clear information about eligibility, service limits, and funding options.
- Review existing policies to ensure they reflect a customer-centered approach.

GOAL 4: STRENGTHEN COUNSELOR EXPERTISE AND RESPONSIVENESS TO CUSTOMER NEEDS

Customers continue to ask for counselors who are well-versed in current technology and who can effectively support individuals from a variety of backgrounds. Ongoing professional development will ensure staff can meet these expectations.

STRATEGIES:

- Provide regular training on new and emerging technologies, including AI tools prevalent in the workplace, accessibility software, and modern workplace collaboration tools.
- Offer professional development focused on working effectively with DeafBlind individuals and others with varied communication and support needs.
- Encourage counselors to support a wider range of career paths, including self-employment and creative work.
- Include training that promotes awareness of different life experiences and perspectives, delivered in collaboration with community organizations.

GOAL 5: SUPPORT EMPLOYMENT AND CAREER DEVELOPMENT

Customers placed high value on help finding and keeping meaningful work. They also expressed the need for more support when changing careers due to vision loss. Building stronger employment partnerships and career guidance will help more people reach their goals.

STRATEGIES:

- Simplify approval processes for self-employment and nontraditional career options.

- Strengthen partnerships with employers to promote inclusive hiring.
- Provide follow-up support to help customers succeed and stay employed.
- Develop services for people adjusting to vision loss later in life.
- Increase access to internships, apprenticeships, and other work experiences.

GOAL 6: MODERNIZE PROGRAM STRUCTURE AND POLICIES

Customers and staff both noted that some processes remain cumbersome. Updating administrative systems and allowing more flexibility in funding and reporting will make it easier to deliver services efficiently.

STRATEGIES:

- Simplify surveys and forms to make them easier to complete, including a comprehensive review of all surveys and mass communications to customers.
- Allow more flexibility in how funds are used for technology, tuition, and housing.
- Update employment models to reflect hybrid and remote work realities.
- Continue developing accessible electronic tools for application and referral.

GOAL 7: ENSURE PHYSICAL AND DIGITAL ACCESSIBILITY

Some customers, particularly those who are DeafBlind, described physical barriers and limited assistive technology in reception areas. Making both physical and digital spaces fully accessible ensures equitable participation for everyone.

STRATEGIES:

- Equip reception and service areas with braille displays and communication tools.
- Conduct regular accessibility reviews of facilities and digital systems.
- Provide accessible communication options for customers with complex needs.
- Work with community partners and membership organizations to test and improve accessibility solutions.

GOAL 8: SHARE SUCCESSES AND BUILD PUBLIC AWARENESS

Telling the stories of people who have benefited from SSB services helps raise awareness, strengthens partnerships, and increases confidence in service delivery leading to meaningful outcomes.

STRATEGIES:

- Collect and share success stories through newsletters, DEED publications, and social media.
- Feature at least one new customer story each month.
- Highlight collaboration with employers and training partners.
- Incorporate storytelling into program evaluation and outreach.

1. Improve Partnerships. Increase interagency coordination with local and state workforce partners so individuals who are blind, low vision, and DeafBlind, and employers have a customer-centric, positive experience no matter which “door” they enter. The basis for this goal/priority is SSB’s Evolve: VR Initiative.

- ◆ Implement an outreach and training campaign that increases the relationships and engagement between Community Partners and SSB staff, so customers quickly receive needed services by:

1. Building a Community Partner Search Tool in WF1 so staff can quickly locate service providers.
2. Hosting regularly scheduled Community Partner and WDU staff training sessions that focus on a certain service type and inviting partners who provide that service to introduce themselves and their services.
3. Developing a schedule to regularly engage with Workforce partners to remind and educate them about how best to work with, and refer individuals to, SSB.

- Develop and nurture old and new partnerships with entities that represent underserved groups, including:

- organizations that serve veterans,
- 4. communities of color,
- 5. English language learners
- 6. Tribal communities,
- 7. individuals with severe and persistent mental illness,
- 8. justice involved individuals,
- 9. individuals with complex and significant disabilities, and
- 10. immigrants and refugees.

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- Develop a universal application and process by:

1. Creating a digital, accessible referral process that quickly and easily connects customers to a WDU staff.
2. Designing an electronic application that is easy to complete and deliver to WDU staff.

- Further advance and support the E1MN framework by:

1. Hiring a Multiple Systems and Pathways Navigator that works with students with significant disabilities, families, educators, and others in navigating the complex employment services program (including waiver services).
2. Training identified staff in becoming benefits planning experts that can help individuals who are receiving benefits understand the implications of employment (both positive and negative) on their financial situation.
3. Pre-ETS Coordinator delegates counselors to serve on regional E1MN teams who meet quarterly with representatives from the general agency, local school districts, and county case workers. This allows teams to build partnerships and implement the framework locally.

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2. Increase the Workforce Participation Rate. Build relationships with businesses that lead to career opportunities with family sustaining wages for individuals who are blind, low vision, and DeafBlind. It is recognized that services prior to job placement in the individuals plan may include internships and work opportunities that build a work foundation which leads

to meaningful and career path employment. The basis for this goal/priority is SSB's Evolve: VR Initiative.

- Redesign how we prepare job seekers and connect them with vacancies by implementing the Rapid Placement Model that places customers into their chosen field as quickly as possible by:

1. Reimagining WDU's employment services model so the framework meets the needs of customers, businesses, and staff.
2. Establishing a system and process that connects customers to vacancies quickly and efficiently.
3. Better utilizing the WF1 Talent Pool page so job leads are easily shared with customers.
4. Engaging fully with E1MN to develop and use relationships with long term support providers to accelerate customers transition to those supports.

2. Focus on Diversity, Equity, Inclusion, and Accessibility. Create an agency that better meets the needs of the current and emerging workforce, including improving services to new Americans, underrepresented communities, and veterans. The basis for this goal/priority is SSB's Evolve: VR Initiative.

- Develop new, and nurture existing, partnerships with entities that represent underserved groups, including:

- Organizations that serve veterans
- Communities of color
- English Language Learners
- Tribal communities
- Individuals with severe and persistent mental illness
- Justice involved individuals
- Individuals with complex and significant disabilities
- Immigrants and refugees

4. Marketing Work Ready Individuals to Employers. Identify and implement innovative and evidence-based practices, and service delivery approaches so that individuals with disabilities have the same opportunities in the labor market as everyone else. The basis for this goal/priority is SSB's Evolve: VR Initiative.

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- Utilize all available opportunities to encourage eligible employers to use the Employer Reasonable Accommodation Fund for potential and existing employees with disabilities.
- Develop and launch a public outreach and engagement campaign using multiple modes of communication to broadcast to employers that hiring blind, visually impaired, and DeafBlind people is essential to solving their workforce shortages.
- Create a Rapid and Continuous Engagement framework so customers can begin receiving services quickly and sustain their momentum while they are engaged in services. This framework may include:
 - Rapid Eligibility Model
 - Rapid Assessment Model
 - Continuous Engagement Model
 - Rapid Placement Model

SSB has determined it necessary to engage in activities to establish, develop, or improve facilities for community rehabilitation programs (CRPs) (hereinafter “establishment projects”) in the State for the purpose of providing vocational rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services to students with disabilities who are eligible or potentially eligible for the VR program. These activities will be required to meet our above-described goals and priorities.

For example, due to an almost 25% decrease in adjustment to blindness service providers since COVID, which impacts achieving our goals and strategies, SSB has been hiring their own in-house staff to provide some of those services. Specifically, we have hired two rehabilitation teachers, one for the VR program, and one for the Older Blind program. For that reason, infrastructure improvements need to be completed, including a cafeteria remodel into a rehabilitation teaching space, which will provide better availability to serve customers. This flexibility will allow our customers to receive their services quickly and in a safe environment.

In addition, as a result of the pandemic, a large shift was made toward a hybrid service delivery model. This means offering services through a variety of methods, including virtual. Many of our meetings and trainings with customers, community partners, and council members are either virtual or a combination of virtual and in-person. Our current infrastructure at our 2200 University headquarters does not allow for accessible hybrid meetings, which means our customers and partners do not have as much flexibility in their ability to choose how they receive their services. This necessitates the need to make improvements to our building to provide better flexibility in service delivery.

(d) Evaluation and Reports of Progress: VR and Supported Employment Goals, For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that

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program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

- (1) Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs;
[text box: List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies]

PY2024-2025 Goals, Priorities, and Strategies

Goal/Priority 1: Improve Partnerships. Increase interagency coordination with local and state workforce partners so individuals who are blind, low vision, and DeafBlind, and employers have a customer-centric, positive experience no matter which “door” they enter. The basis for this goal/priority is SSB’s Evolve: VR Initiative.

Strategies:

A. Implement an outreach and training campaign that increases the relationships and engagement between Community Partners and SSB staff, so customers quickly receive needed services by:

- Building a Community Partner Search Tool in WF1 so staff can quickly locate service providers.
- Hosting regularly scheduled Community Partner and WDU staff training sessions that focus on a certain service type and inviting partners who provide that service to introduce themselves and their services.
- Developing a schedule to regularly engage with Workforce partners to remind and educate them about how best to work with, and refer individuals to, SSB.

B. Develop and nurture old and new partnerships with entities that represent overlooked groups, including:

- organizations that serve veterans.
- communities of color.
- English language learners
- Tribal communities.
- individuals with severe and persistent mental illness.
- justice involved individuals.
- individuals with complex and significant disabilities, and
- immigrants and refugees.

C. Develop a universal application and process by:

- Creating a digital, accessible referral process that quickly and easily connects customers to a WDU staff.
- Designing an electronic application that is easy to complete and deliver to WDU staff.

D. Further advance and support the E1MN framework by:

- Hiring a Multiple Systems and Pathways Navigator that works with students with significant disabilities, families, educators, and others in navigating the complex employment services program (including waiver services).
- Training identified staff in becoming benefits planning experts that can help individuals who are receiving benefits understand the implications of employment (both positive and negative) on their financial situation.
- Pre-ETS Coordinator delegates counselors to serve on regional E1MN teams who meet quarterly with representatives from the general agency, local school districts, and county case workers. This allows teams to build partnerships and implement the framework locally.

REVIEW

Strategy A.

Outreach: SSB's Community Partners team added bi-monthly Community Partner Forums and Drop-In Cafes with Community Partners and SSB staff to connect, share information, exchange ideas, and express concerns. These meetings are open to all SSB staff and are well attended by Community Partners. Additionally, SSB's Community Partner team has an open-door policy for Community Partners to schedule meetings at any time they want or need to discuss topics of concern, billing, or training issues.

The Community Partner webpages have been updated and expanded to include an interactive map detailing the services each Community Partner provides and the locations within the state they work. This map is available to both SSB staff and customers. Together, counselors and customers can find the best options for the customers' needs.

The Community Partners team has been collecting 'elevator pitch' videos of each of the Community Partners where partners can detail the services they provide and give greater clarity on how they operate. The videos are uploaded on the Community Partner webpages and are available for SSB staff and customers to preview as they choose the Community Partner that best fits their training needs. This allows for greater customer choice in deciding which Community Partner to utilize.

The Community Partners team has resumed their monitoring visits with Community Partners. A new monitoring tool has been developed to gather feedback from customers and SSB staff to best evaluate the Community Partner on training effectiveness and compliance with contract requirements.

All Community Partners have been encouraged to use WorkForce One (WF1) for entering their billing and reports. Community Partners have access to WF1 training and supports. For the Community Partners who have implemented WF1, the communication, invoicing, and paying processes have been streamlined and efficient.

Strategy B.

Some SSB customers cannot advance in their employment goals due to low English language proficiency. This prevents them from obtaining a GED, completing job applications, and participating in the interview process; all of which are critical to meaningful, long-term employment. SSB has hired an English Language Instructor to work with customers where the English language is a significant barrier to attaining their employment goals.

More work needs to be done to nurture old and develop new partnerships with entities in an effort to activate overlooked blind, low-vision, and DeafBlind workers throughout the state. While one component of this strategy has been met, more needs to be done to enhance productive partnerships.

Strategy C.

A digital, accessible referral form has been developed and is featured prominently on the SSB website homepage. This referral form has improved the process for timely connection between SSB customers and WDU staff.

After many tests, it was decided that it was not feasible to connect an electronic application directly to WF1. It was determined that customers can only be accessed in WF1 after a record has created for them. We cannot begin a new customer record based on an application.

Strategy D.

SSB has hired a Multiple Systems and Pathways Navigator to work with students with significant disabilities, families, educators, and others in navigating the complex employment services program including waiver services. This new position has been working with a caseload of customers, and we are progressing toward ramping-up capacity.

Through the Disability Innovation Fund (DIF) grant, SSB has hired a Benefits Navigator to help individuals who are receiving benefits understand the positive and negative impacts of employment on their financial situations. While their main focus is on DIF grant priorities, the Benefits Navigator is available to assist WDU customers.

Pre-ETS counselors did attend regional E1MN meetings. These meetings have changed and are no longer happening. However, there will be a few "pilot teams" that DEED VRS is coordinating, and SSB's Pre-ETS team will have staff involved if these teams have low vision, blind, or DeafBlind participants.

Goal/Priority 2: Increase the Workforce Participation Rate. Build relationships with businesses that lead to career opportunities with family sustaining wages for individuals who are blind, low vision, and DeafBlind. It is recognized that services prior to job placement in the individual's plan may include internships and work opportunities that build a work foundation which leads to meaningful and career path employment. The basis for this goal/priority is SSB's Evolve: VR Initiative.

Strategies:

A. Redesign how we prepare job seekers and connect them with vacancies by implementing the Rapid Placement Model that places customers into their chosen field as quickly as possible by:

- Reimagining WDU's employment services model so the framework meets the needs of customers, businesses, and staff.
- Establishing a system and process that connects customers to vacancies quickly and efficiently.
- Better utilizing the WF1 Talent Pool page so job leads are easily shared with customers.
- Engaging fully with E1MN to develop and use relationships with long-term support providers to accelerate customers transition to those supports.

REVIEW

This goal is continuing. SSB is laying the groundwork for the rapid replacement model, connecting with employers, and transitioning customers to long-term supports efficiently. While SSB is engaging in these strategies, outcomes are dependent on factors outside of our scope, such as customer motivation and family support.

Goal/Priority 3. Focus Activating Overlooked Workers. Create an agency that better meets the needs of the current and emerging workforce, including improving services to new Americans, overlooked communities, and veterans. The basis for this goal/priority is SSB's Evolve: VR Initiative.

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Strategies:

A. Develop new, and nurture existing partnerships with entities that represent overlooked groups, including:

- Organizations that serve veterans
- Communities of color
- English Language Learners
- Tribal communities
- Individuals with severe and persistent mental illness
- Justice involved individuals
- Individuals with complex and significant disabilities
- Immigrants and refugees

REVIEW

As stated in Goal 1, Strategy B, additional efforts are needed to strengthen existing partnerships and establish new ones with organizations that can help engage overlooked blind.

low-vision, and DeafBlind workers across the state. This goal is ongoing, as further work is required to build more effective and productive collaborations.

Goal/Priority 4. Marketing Work Ready Individuals to Employers. Identify and implement innovative and evidence-based practices, and service-delivery approaches so that individuals with disabilities have the same opportunities in the labor market as everyone else. The basis for this goal/priority is SSB's Evolve: VR Initiative.

Strategies:

A. Utilize all available opportunities to encourage eligible employers to use the Employer Reasonable Accommodation Fund for potential and existing employees with disabilities.

B. Develop and launch a public outreach and engagement campaign using multiple modes of communication to broadcast to employers that hiring blind, low vision, and DeafBlind people is essential to solving their workforce shortages.

C. Create a Rapid and Continuous Engagement framework so customers can begin receiving services quickly and sustain their momentum while they are engaged in services. This framework may include:

- Rapid Eligibility Model
- Rapid Assessment Model

REVIEW

Strategy A:

As the Employer Reasonable Accommodation Fund (ERAF) enters the final sage of its two-year pilot phase, the program has firmly established itself as a critical tool for advancing disability inclusion and workplace accessibility across Minnesota. Designed to reimburse small and mid-sized businesses for the costs of job-related accommodations, ERAF has demonstrated its effectiveness in helping employer retail valued employees, improve workplace productivity, and overcome financial barriers to compliance.

To date, ERAF supported 104 unique employers and distributed more than \$1.35 million in reimbursements. Applications more than doubled from FY24 to FY25, with strong engagement in both the Twin Cities metro area and Greater Minnesota. Participating employers reported measurable improvements in retention, reduced turnover costs, and overall satisfaction with the program's ease of use and impact.

Strategies B & C:

With funds from the Disability Innovation Fund (DIF) Grant, SSB has activated a new Evolve Employment team with the goal of creating a dual-customer model to address the unique employment challenges faced by blind, low vision, and DeafBlind individuals and their current

and potential employers. We know that Minnesota businesses benefit when they hire and retain employees with vision loss. Evolve Employment will provide no-cost support to businesses to make recruitment, onboarding, and workplace accessibility easy.

Evolve Employment will assist customers with:

- Benefits Planning
- Adapted Training
- Worked-Based Learning
- Advanced Technology Training

Evolve Employment will collaborate with businesses on:

- Digital Accessibility Support
- Accommodation Implementation
- Career Retention and Advancement

Evolve Employment's outreach efforts include messaging that inclusive hiring isn't just the right thing to do - it's smart business. Including some key facts:

- 89,300 Minnesotans identified with a visual disability in 2023 American Community Survey (ACS).
- Nationwide, the number of adults with uncorrectable vision loss is expected to **double by 2050.**
- 4 in 10 adults (93 million Americans) are at high risk for vision loss.

And emphasizing the Business Case for Inclusive Hiring and Retention including:

- Every \$1 invested in disability hiring returns \$3 in value.
- Accommodations typically cost \$0-\$300, while replacing an employee costs 50-200% of their salary.
- Inclusive companies see higher revenue (+1.6x), net income (+2.6x), and productivity (+25%).
- 85% of employers retain valued employees through accommodations.

2022 – 2023 Goals, Priorities, and Strategies

(1) Priority: Competitive Integrated Employment

Strategies:

- A. Implement a model for coordinating employer services with DEED Workforce Innovation and Opportunity Act (WIOA) partners, including:

- Title I Adult/Dislocated Worker; Youth
- Title III Job Seeker Services
- Title IV Vocational Rehabilitation Services
- SSB is working with DEED partners and stakeholders to develop a Client Relationship Management tool. Currently partners are determining the cost to use Minnesota IT for consulting and services and what funding they can commit. Once this is finalized, the planning process will begin by identifying partner business and customer needs and how to assemble these into a cohesive product.
- Monitor the Employer One Stop online virtual hub representing all partners and available services and determine any modifications and adjustments needed to ensure its effectiveness.
- Monitor the E1MN section of the Disability HUB website for DEED outreach and marketing and determine any modifications and adjustments needed to ensure its effectiveness.

Review:

We have made considerable progress on designing a model for better, more coordinated employer services across our department. For example, we now have regional meetings across DEED divisions related to serving businesses and connecting them with workforce services, including talent recruitment.

There has been, unfortunately, no progress on the Client Relationship Management (CRM) tool. We were also not able to create the Employer OneStop hub as we envisioned, since the Department resources were instead put towards improving the CareerForceMN.com platform. However, we have identified a new avenue to accomplishing both items, which includes leveraging the new labor exchange system that is being designed.

Several partners within DEED expressed interest in obtaining a CRM, such as Salesforce, to better track our contacts with businesses. A few divisions within DEED already had Salesforce, and other divisions did not see the benefit. While it has limits, it is a good tool for tracking the employer relationship side of our work. Instituting a new system across partners, including funding agreements and joint policies, is a large scale effort that requires consensus. While we had Commissioner's Office support, we did not have consensus across all partners. We are undergoing a digital transformation project, which includes a new labor exchange system, and there was fear a CRM would require dual entry. We are now determining if the new labor exchange, which will integrate with CareerForceMN.com, could meet our needs instead. We are confident that the digital transformation work within DEED will result in a system which will allow us to better engage with businesses and track those contacts. In addition, we believe that instead of creating a new system, modifications could be made to our existing CareerForceMN.com, and will act as the hub we envisioned. SSB is on the steering committee for this entire project, which allows us provide input and share feedback.

Under the E1MN initiative with the Departments of Education and Human Services, a process map was developed called the Engage, Plan, Find, Keep framework, which clarifies roles and determines funding of services for those on Medicaid waivers. E1MN Training was launched in 2023 to support

the E1MN referral and funding decisions for all roles. The Disability Hub Work Toolkit has a section on Supporting People on Waivers that provides tools and resources to support understanding on the Engage, Plan, Find, Keep framework. The Disability Hub is a premiere website site that is constantly being updated and refreshed. This specific strategy has been successfully completed.

B. Implement ongoing training, tracking, and oversight of Measurable Skills Gains (MSG) and credential attainment of students to reach negotiated targets.

- Monitor staff tracking of their customers and input of appropriate documentation by in-depth review of staff input of customers MSG's and credentials between enrollment and disenrollment.
- Ensure accuracy in reporting and validity of the MSGs and credentials claimed.
- Train staff as needed regarding data fixes necessary for these measures.

Review:

While we have made considerable progress as it relates to reporting on, and tracking of, MSGs and credential attainment, we still have a long way to go. Based on recent data reports from RSA, SSB is below the mean when it comes to our performance rates for these two measures. We attribute this primarily to incomplete and inaccurate tracking by staff in our case management system.

We have employed several strategies to mitigate this. Our Quality Assurance Specialist conducts in depth reviews of the MSGs and credentials claimed after each semester, while also flagging staff of potential MSGs that have not yet been claimed. Additionally, multiple reminders are sent as MSG deadlines approach. These reminders include instruction on what needs to be collected as well as links to previous trainings. Throughout the year, additional training is provided to counselors on MSGs and credentials. The training sessions are stored on our YesMLS platform for easy access to additional training. Our case management system has several reports available to staff that assist in identifying potential MSGs and credentials. However, while these strategies have helped us double our MSG rate from the previous program year, they are not fully resolving the issues we have. This coming year, we will be looking at the following activities:

- Full system integration between our case management system and the National Student Clearinghouse (NSC). We already have access to the NSC data. However, it is a manual process and by integrating the data into Workforce One, we can make it automated.
- Hiring an administrative support specialist to assist the quality assurance specialist in case reviews, which will include fixing data entry errors in the system and tracking down supporting documentation. We will still be communicating those errors to counselors, but we know many of the errors are occurring because counselors are incredibly busy managing their caseloads. This is one small thing we can do to reduce administrative burden and increase our accuracy in reporting.

C. In coordination with the Advisory Task Force on State Employment and Retention of Employees with Disabilities, develop and implement methods for the hiring and retention of blind, visually impaired, and DeafBlind customers into state government including using Connect 700 and Supported Worker programs.

Monitor the recommendation document submitted by the Advisory Taskforce to the Legislative subcommittee. Recommendations included items and proposed statutory changes that will specifically support the hiring and retention of blind, visually impaired, and DeafBlind customers, including:

- A requirement for all technology and digital content to be accessible and provided in a timely manner;
- Job posting language to be nondiscriminatory (including not requiring a driver's license when one is not actually needed);
- Hiring managers are made aware of the state Accommodation Fund;
- Reasonable accommodations are provided to allow full participation;
- State Services for the Blind and Vocational Rehabilitation Services must be consulted when it comes to any updates or changes to the Connect 700 policy;
- Training of staff on inclusive environments, digital accessibility standards, and the Americans with Disabilities Act.

State Services for the Blind will continue to work with Minnesota Management and Budget to ensure these recommendations are carried out.

Review:

All strategies in this area are considered complete. This past Legislative session put all the Advisory Taskforce recommendations into the applicable statutes, which includes:

- Strengthening state accessibility requirements
- Establishing nondiscriminatory job posting language, including changing the driver's license requirements to instead say "reliable form of transportation" or equivalent (unless the position is a driving position)
- Providing better awareness of the Centralized Accommodation Fund
- Collaborating with VRS/SSB on changes to the C700 program prior to implementing them
- Requiring mandatory disability training for all levels of staff

The Advisory Taskforce will be reconvening at the start of 2024 to review progress made and conduct oversight on progress made on the above items.

(2) Priority: Internal Controls and Quality Assurance

Strategies:

~~A. Enhance the case review process to allow for real-time results that can be put in SharePoint and allow for trends and patterns that can shape training and accountability and policy process.~~

- ~~• Case reviews will be conducted by the Quality Assurance specialist.~~

Review:

~~As of November 2023, our case review tool has been integrated into our case management system. This allows for a streamlined case review procedure, ability for reviews to be stored in a central location, the option for running reports, and more easily identifying trends that can shape future training or inform policy updates and program decisions. Case reviews are conducted monthly by the Quality Assurance specialist, as well as one supervisor on a rotating basis. This strategy is considered successfully completed.~~

~~B. Create a data dashboard to allow for real-time reporting of performance and demographics.~~

- ~~• We will be continuing the work on developing the data dashboard by reviewing existing tools that may be available to meet this need compared to building our own. The expectation is to have completed this project well within the year.~~

Review:

~~While we have made some progress in this area, we are not as far along as we wanted to be. Our data analyst went on a one-year extended leave, so we have relied on other department data analysts to assist when they are available. We have, however, been able to work with DEED's Performance and Technical Management division to begin building data dashboards in Power BI. We have one report fully completed, which is the post-pandemic application and successful closure trend report. We have a list of other reports we would like to have in a more comprehensive dashboard, once we have the staffing level to do so. We are in the process of hiring a second data analyst who will have a larger focus on the creation of data dashboards and tools.~~

(3) Priority: Under-Represented Populations

Strategies:

- ~~• Increase minority applicants for vocational rehabilitation services who otherwise would not have applied because of statewide outreach with the minority communities. Use applicant data on race, ethnicity, gender, and religion to measure against closure rates to determine if there are trends in unsuccessful closures among a particular protected class.~~

- Once measurements are established, an action plan will be developed to identify what gaps exist and how to reduce them.

Review:

We have made considerable progress in our intentional and targeted outreach efforts toward underserved and underrepresented communities; however, there is still more to be done. The following activities highlight this progress:

- The State Rehabilitation Council for the Blind (SRC-B) revitalized and renamed the Minority Committee to the Diversity, Equity, and Inclusion Committee. This group is tasked with helping SSB reach and serve more individuals from BIPOC communities.
- We added a demographic profile to our customer satisfaction survey so we can track satisfaction by age, gender, race, and ethnicity; satisfaction results show **higher** satisfaction with our services if you are Hispanic/Latino, BIPOC, or DeafBlind.
- We are hiring a second outreach coordinator who will be able to devote time in connecting with those communities who are historically underserved; this includes our Tribal communities.
- We are serving more individuals from BIPOC communities according to our data, however, across the board, these communities have higher unsuccessful closures.
- We established a contract with a new orientation and mobility specialist contractor who is fluent in Somali.
- We have launched our Literacy for All campaign in our Communication Center; this means we are offering more accessible materials in languages other than English. We have been able to translate our brochures in multiple languages, both written and via audio. In addition, we are in the early stages of supporting the Language Revitalization efforts through the Minnesota Department of Education, which is an effort to revitalize the Dakota and Ojibwe languages.

A work group was created to investigate applicant and closure data and identify gaps and trends. This group spent a considerable amount of time reviewing historical data from the last 3 to 5 years. They even dug into case notes to determine what led to the unsuccessful closure. Through that considerable amount of research, they identified the biggest area of need had to do with serving new Americans and refugees. DEED is fortunate to have the Office of New Americans. The work group met with the Assistant Commissioner for that office to learn more about this population, including cultural components.

It was identified that many staff lack cultural awareness, especially when it comes to how we describe our services and the purposes of our program. We also have a significant lack of service providers who know how to bridge language and cultural barriers, especially when those barriers are partnered with vision loss or blindness. We are unsure what we can do to develop community partners with this skill set, but we are considering the creation of "community liaisons" who can serve as a cultural bridge between SSB staff and the communities.

SSB staff members are receiving ongoing training as it relates to diversity, equity, inclusion, and accessibility, but this training is geared more towards their employment through the State of Minnesota and less around how to engage with, and serve, customers. We are considering

implementing the ABCs of Cultural Competence to staff, which is a training offered through UA Currents.

(4) — Priority: Transition and Pre-Employment Transition Services (Pre-ETS)

Strategies:

A. — Develop a longitudinal study on all youth (ages 25 and younger) case closures. Identify factors that contribute to successful or unsuccessful outcomes.

- — The Transition Subcommittee of the SRC-B has requested the data on case closures specifically for student and youth 25 and under with successful and unsuccessful closures.
- — When the data is received, the Transition Subcommittee will evaluate to identify factors that contribute to successful or unsuccessful outcomes.
- — Based on these factors, we will begin to develop strategies to address how better to ensure successful outcomes.

Review:

These strategies were not implemented, and thus this has not been successfully completed. Due to SSB staffing changes and shifts in leadership of the committee, this work was unable to commence. The committee still plans to move forward with the study, once the second SSB data analyst has been hired.

(5) — Priority: Staff Training and Development

Strategies:

A. — Provide a comprehensive and structured training curriculum for new employee onboarding and ongoing staff training by the designated trainer.

- — The designated trainer is developing the comprehensive and structured training curriculum for new employee onboarding and ongoing staff training. Expected outcomes are:
 - — On boarding and training packages specific to each role that make up the Workforce Development Unit (WDU)
 - — An annual training and development schedule for the WDU as a whole and for specific unit roles and functions
 - — Acquiring data about training effectiveness and adjusting as needed

Review:

SSB hired a dedicated staff development specialist, who oversees our annual training plan, as well as ad hoc and on-demand training. Our trainer has improved the existing onboarding training, creating a robust and comprehensive onboarding for all new WDU staff. Counselor and VR Tech training plans have been built along with plans geared more toward the other roles in WDU and other units that require a less comprehensive training.

The trainer has also constructed an annual training plan to ensure unit staff are receiving the training necessary to continue to do their work and develop in their roles. This includes monthly counselor only training sessions that focus on topics specific to counselors and provide counselors a venue to collaborate with one another regularly. At times, training topics may be relevant to other unit roles, and the staff in those roles are invited to attend those sessions.

Additionally, there is a training newsletter that goes out weekly and identifies training opportunities that may be valuable to unit staff.

We have been able to procure the YesLMS platform, which houses all of our training. YesLMS puts together content for us which we can modify to meet our needs or upload our own. CEUs are available for many of them.

We have successfully completed this strategy.

A. Increase the level of awareness of the importance of timely communication with customers in response to customer comments on the Customer Satisfaction Survey (CSS)

- The Customer Outcomes and Goals & Priorities Committee, together with SSB staff, will monitor the frequency of comments on subsequent surveys.
- SSB staff will investigate other internal controls that could be useful in identifying any communication timeliness problems.

Review:

Each year when the results of the annual customer satisfaction survey are released, SSB leadership reviews every individual comment. While timeliness in communication continues to be a frequently referenced issue, it appears to be targeted toward only one or two specific staff and not the entire work unit. For that reason, we have been able to address those instances on a case-by-case basis. Overall, due to steps we have taken, and continue to take, to reduce administrative burden on staff, we see fewer complaints about communication responsiveness. Staff turnover was another major factor in communication timeliness. At one point, we were down several counselors and VR Techs, and we had a turnover rate of more than 30%. At the time of this review of our goals and priorities, we are almost fully staffed and have less than 5% turnover. Caseloads are at an average of 45, and we have no counselor vacancies.

We also have a number of internal controls in place to monitor this data on an ongoing basis.

Timely communication in internal controls via caseload reviews

Internal control:

Every caseload review includes the date of the last live contact each customer had with SSB, as well as the date that the next live contact is due (the 90-day mark), if it's within the next 30 days. The dates under 'Next Live Contact' might be highlighted (or noted for those with a visual impairment) yellow or red—yellow indicating the next live contact due date is coming up within the next month, or red indicating that the due date has passed, and we did not make live contact with the customer within 90 days of the last live contact. However, even if a due date is red, a counselor may have still made attempted contacts which is always noted for the counselor and supervisor to see. Any concerns that are identified, including a lot of past due dates *without* attempted contacts, are emailed to the supervisor who is asked to review the report with the counselor.

Trends:

We have not seen any overall trends or changes in this area. Counselors are primarily consistent in how much red or yellow they have on their individual caseload reviews, whether that's a lot or none at all.

Timely communication in internal controls via intensive case reviews

Internal control:

Every intensive case review includes reviewing the items listed below:

- Correspondence with customer, vendors, and other SSB staff is professional, and responses are sent in a timely manner.
- Counselor maintained contact with customer at least once every 90 days. Or, if customer did not respond to contact attempts, counselor continued to try to engage customer until contact could be made.

Trends:

Counselor review ratings on these items have not included any non-compliant; they are always mostly compliant and most often, compliant ratings.

- (2) **Performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and**

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<u>Performance Indicators</u>	<u>PY24 Actual SSB</u>	<u>PY24 Actual Combined</u>	<u>PY24 Negotiated</u>
<u>Employment (Second Quarter After Exit)</u>	<u>50%</u>	<u>55%</u>	<u>58%</u>
<u>Employment (Fourth Quarter After Exit)</u>	<u>46%</u>	<u>55.4%</u>	<u>57.9%</u>
<u>Median Earnings (Second Quarter After Exit)</u>	<u>\$8,508</u>	<u>\$3,696.25</u>	<u>\$3,850</u>
<u>Credential Attainment Rate</u>	<u>31%</u>	<u>40.6%</u>	<u>44.5%</u>
<u>Measurable Skill Gains</u>	<u>56%</u>	<u>56.3%</u>	<u>50.7%</u>

<u>Performance Indicators</u>	<u>PY22 Actual SSB</u>	<u>PY22 Actual Combined</u>	<u>PY22 Negotiated</u>
<u>Employment (Second Quarter After Exit)</u>	<u>39%</u>	<u>58%</u>	<u>51.5%</u>
<u>Employment (Fourth Quarter After Exit)</u>	<u>35%</u>	<u>58%</u>	<u>49.6%</u>
<u>Median Earnings (Second Quarter After Exit)</u>	<u>\$7,326.00</u>	<u>\$3,722.50</u>	<u>\$3,411.00</u>
<u>Credential Attainment Rate</u>	<u>34%</u>	<u>44%</u>	<u>31%</u>
<u>Measurable Skill Gains</u>	<u>41%</u>	<u>51%</u>	<u>50.3%</u>

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The discrepancy between the actual and negotiated rates for Employment in the 2nd and 4th quarters after exit is a result of individuals leaving employment after case closure. We continue to work with SSB staff and Community Partners on encouraging and assisting participants to pursue long term, sustainable employment rather than a job that may not be sustainable or meet the long term needs of the individual. Additionally, we encourage staff to ensure that employment is stable and likely to be maintained at time of case closure and to keep cases open if the likelihood of job retention is low. Ultimately, we continue to see customers leaving their jobs after case closure, sometimes returning to SSB for assistance finding new employment.

- (3) **The use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).**

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SSB uses funds reserved for innovation and expansion activities for its State Rehabilitation Council for the Blind (SRC-B). For FFY ~~2024~~2026, the SRC-B has budgeted ~~\$35,730~~ \$35,270, with the majority of its budgeted line items for interpreters, Court Reporting and Transcription, council member compensation and travel expenses for SRC-B meetings, and council member

conference related expenses including registration and out of state travel expenses. Some members of the SRC-B are eligible to receive a per diem of \$55 a day while on council business. In ~~addition~~addition, all members are eligible for expense reimbursement as authorized by the commissioner's plan for each day spent on authorized council activities. These activities include meetings and conferences approved by the council and are at least two hours or more. The reimbursement for meals and other travel related expense are covered and not part of the per diem they receive. The NCSRC, CSAVR and NCSAB conferences are typically approved by the council for members to attend semi-annually. These conferences shed light on national information shared by other SRC's and is helpful for members to attend. SSB's council is very active and interested in the state of VR at the local, state, and federal level; therefore, funding is budgeted to send at least one to two council members to the spring and fall CSAVR/NCSAB conferences.

STATE REHABILITATION COUNCIL FOR THE BLIND			
FFY 2026			
<u>10/01/2025 -09/30/2026</u>	FFY2026	FFY2026	FFY2025
COUNCIL BUDGET	Budgeted	Spent	Balance
-	-	-	-
Board/Council Member Comp	\$ 6,000	-	6,000.00
Conference Per Diem Per 2 Participants x 4 conferences		-	-
Court Reporter & Transcriber	\$ 5,600	-	5,600.00
Educational-Instruction Serv	\$ 700	-	700.00
Travel Expense - In-State (uber, mileage, food)	\$ 1,200	-	1,200.00
Living Expense - In-State (hotel only)	\$ -	-	-
Private Auto Mileage In State	\$ -	-	-
Travel Expense Out of State (Air,Uber,Mileage & Food)	\$ 2,500	-	2,500.00
Living Expense Out of State(hotel)	\$ 5,600	-	5,600.00
Private mileage (Out of State)	\$ -	-	-
Awards/Supplies	\$ 350	-	350.00
Regist Fees-Conf-Sem Out StP	\$ 3,000	-	3,000.00

Food (Not Food Service)	\$ 2,500	-	2,500.00
Repair To Equip And Furniture	\$ -	-	-
Other Purchased Services (Interpreters) including	\$ 5,820	-	5,820.00
Veritext - Close Captioning	\$ 2,000	-	2,000.00
Transportation Paid to Vendor	\$ -	-	-
-	-	-	-
TOTAL EXPENDITURES	\$ 35,270	-	35,270.00

STATE REHABILITATION COUNCIL			
FOR THE BLIND FFY 2024			
-	-	-	-
-	FFY2024	FFY 2024	FFY2024
COUNCIL BUDGET	Budgeted	Spent	Balance
-	-	-	-
410706 Board/Council Member Comp	\$ 6,000	-	\$ 6,000
Conference Per Diem Per 2 Participants x 4 conferences		-	
411313 Court Reporter & Transcriber	\$ 3,100	-	\$ 3,100
411319 Educational Instruction Serv	\$ 1,360	-	\$ 1,360
411601 Travel Expense - In State (uber, mileage, food)	\$ 1,000	-	\$ 1,000
411602 Living Expense - In State (hotel only)	\$ 400	-	\$ 400
411605 Private Auto Mileage In State	\$ 700	-	\$ 700
411701 Travel Expense Out of State (Air, Uber, Mileage & Food)	\$ 5,000	-	\$ 5,000
411702 Living Expense Out of State(hotel)	\$ 4,500	-	\$ 4,500
411705 Private mileage (Out of State)	\$ -	-	\$ -
413001 Awards/Supplies	\$ 350	-	\$ 350
411803 Registration Fees Conf Sem Out of State	\$ 4,000	-	\$ 4,000
413006 Food (Not Food Service)	\$ 1,500	-	\$ 1,500
415001 Repair To Equip And Furniture	\$ -	-	\$ -
430001 Other Purchased Services (Interpreters) including	\$ 7,820	-	\$ 7,820
Veritext - Close Captioning			-

430007 Transportation Paid to Vendor	\$	-	-
-	-	-	-
TOTAL EXPENDITURES	\$ 35,730	\$ -	\$ 35,730

(e) Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

(1) Acceptance of title VI funds:

(A) [check box] VR agency requests to receive title VI funds.

(B) [☒] VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.

(2) If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

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Minnesota State Services for the Blind does not elect to receive title VI funds and understands that supported employment services must still be provided under title I.

(3) Supported employment services may be provided with title 1 or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe 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; and the timing of transition to extended services.

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Minnesota State Services for the Blind does not elect to receive title VI funds and understands that supported employment services must still be provided under title I. SSB is declining supported employment dollars, as the requirements for using those dollars are too restrictive. These funds have youth matching requirements, and the funds can only be used once the individual enters employment. Youth with significant disabilities often require more in-depth and comprehensive training before they are able and ready to enter into employment; therefore, they are often over the age of 25 by the time this occurs. Should there be flexibility on when the funds can be used and a change to the supported youth matching requirements, SSB will revisit declining funds.

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Supported employment services promoting the integration of people with the most severe disabilities into employment in Minnesota have become increasingly available. The scope and quality of supported employment services have improved as more entities become

aware of the benefits of ongoing employment supports for individuals with the most significant disabilities. The recent implementation of E1MN has provided a more seamless system between waiver and vocational rehabilitation. However, the demand for supported employment exceeds the capacity of systems in Minnesota to provide the necessary extended ongoing employment supports. SSB will continue to engage in capacity building and technical assistance efforts with other state agencies and community service providers. For example, SSB is currently identifying solutions to increase the availability of job coaches, especially job coaches that are available to provide long-term supports. SSB implemented a payrate increase for providers. Additionally, SSB hired two in-house job coaches to help supplement the job coaching offered by our providers.

SSB provides up to 24 months of supported employment services, beginning after job placement, to allow youth to attain job stabilization prior to the transition to extended services. SSB may provide more than 24 months of supported employment services if the need for additional time is identified in the IPE. SSB may act as the direct extended services provider to a youth with a most significant disability until the youth reaches age 25 or receives 4 years of extended services through the VR agency, whichever occurs first. SSB then arranges for another extended services provider to continue delivering extended services to youth. SSB does not fund or directly provide extended services to individuals who are not youth with most significant disabilities.

When vocational rehabilitation services are completed, a customer transitions to extended services. That transition occurs when the individual achieves the goals set out in their supported employment IPE, when they reach stability on the job, and when a service provider agrees to begin providing the needed ongoing employment supports. In most cases, the transition from vocational rehabilitation services to extended services occurs within three months. In Minnesota, the sources of ongoing support primarily include the counties, community rehabilitation programs, or other private non—profit organizations. SSB provides up to 24 months of supported employment services after job placement unless additional time is needed for the individual to achieve job stabilization and transition to extended services. SSB may directly provide extended services to youth with most significant disabilities for up to four years, or until the youth reaches age 25, whichever occurs first. SSB does not provide extended services to individuals who are not youth with disabilities.

- (4) **Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(c)(19)(v).**

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DEED-VRS/SSB entered into a Memorandum of Understanding (MOU) with the DHS Disability Services Division (DHS-DSD) as of September 23, 2019. The purpose of the MOU was to

improve employment services, including the transition to extended services, for individuals with the most significant of disabilities. As highlighted in the MOU, DEED & DHS agreed to work together to align systems so that common customers who receive home and community-based service (HCBS) disability waivers and vocational rehabilitation services (VRS) from DEED-VRS or SSB get seamless and timely supports to make informed choices and meet competitive integrated employment goals.

From these efforts, a model was developed called E1MN (Employment First Minnesota). E1MN works to deliver a seamless and timely employment support system for youth and adults with disabilities so they understand their options and get what they need to achieve and maintain competitive integrated employment. E1MN is led by the State of Minnesota Departments of Education (Career and Technical Education and Special Education), Employment and Economic Development (Vocational Rehabilitation Services and State Services for the Blind) and Human Services (Disability Services Division). E1MN coordinates their work through steering committees for adults (out of school, including out of school youth) and youth (in school).

A framework was developed as part of E1MN that describes the continuum of employment services called Engage-Plan-Find-Keep. This framework shows how waiver employment services and supports through Vocational Rehabilitation Services/State Services for the Blind support people at different stages of their path to employment.
<https://disabilityhubmn.org/media/sqsbrsac/e1mn-efpk-framework.pdf>.

The overall strategies of E1MN include:

- Aligning our systems — policies, programs, funding, providers, and roles — to better coordinate services and Employment First approaches.
- Connecting partners to solve problems, remove barriers, and transform services.
- Using data and information to drive our work and seek continuous improvement.
- Building on existing strengths and great ideas while developing new resources to share.
- Engaging with our shared customers and stakeholders to communicate our work and incorporate their insights.
- Working with local and culturally specific partners to improve and assure access and equity.
- Building a unified voice through shared communications, training, and support to foster consistent practices and messages for all stakeholders.
- Supporting families in setting a positive trajectory for employment and independence for their child.
- Incorporating person-centered tools and practices to help create a common language and experience for our shared customers.

Minnesota State Services for the Blind has several professional/technical contracts with local providers that offer supported employment services, including customized employment and job coaching. There is a goal as part of E1MN to obtain as many providers as possible to have both a professional/technical contract with DEED-SSB/VRS and a 245(d) license through DHS. That way, the same provider can work with the individual through their entire continuum of employment services (job search, job placement, short-term supports, and long-term extended services). Unfortunately, many providers find the 245(d) license process to be lengthy, confusing, and expensive. In order for our goal to be successful, DHS has been looking at ways to streamline the process in the future.

In addition to what has been described above, Minnesota VRS has a unique state-only funding appropriation to providing ongoing employment supports to individuals with disabilities called

the Extended Employment program. SSB eligible customers have been able to take advantage of this available funding if they do not otherwise qualify for waiver-based, long-term employment services (e.g. job coaching).

(f) Annual Estimates. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:

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(1) Estimates for next Federal fiscal year—

(A) VR Program; and

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
N/A	12001250	11701200	\$34,40000000,000.00	0

(B) Supported Employment Program.

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
N/A	80	75	\$230,000.00	0

(g) Order of Selection.

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES. *VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

[✓] The VR agency is **not** implementing an order of selection and all eligible individuals will be served.

Minnesota State Services for the Blind will not be implementing an order of selection.

~~[check box] The VR agency is implementing an order of selection with one or more categories closed.~~

~~* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.~~

Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

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• **2. For VR agencies that have defined priority categories describe—**

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(A) **The justification for the order;**

Minnesota State Services for the Blind will not be implementing an order of selection.

(B) **The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and**

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Minnesota State Services for the Blind will not be implementing an order of selection.

(C) **The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.**

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Minnesota State Services for the Blind will not be implementing an order of selection.

• **3. Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?**

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[check box] Yes

[x] No

Minnesota State Services for the Blind will not be implementing an order of selection.

(h) Waiver of Statewideness. The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

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Not Applicable

(i) Comprehensive System of Personnel Development. In accordance with the requirements in section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

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(1) Analysis of current personnel and projected personnel needs including—

- (A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;
- (B) The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and
- (C) Projections of the number of personnel, broken down by personnel category, who will be needed by the VR 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.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Director	1	1	1
Deputy Director	1	1	1
Supervisor	5	5	5
Pre-ETS Coordinator	1	1	1
Rehabilitation Counselor	14	16	18
Pre-ETS Rehabilitation Counselor	3	3	3
Vocational Rehabilitation Technician	11	12	12
Employment Specialist	4	4	4
Pre-ETS Work Opportunities Navigator	2	2	2
Job Coach	2	2	2
Rehabilitation Teacher	1	1	1
Orientation and Mobility Instructor	2	2	2
Assistive Technologist	5	5	5
Data Analyst	2	2	<u>2</u>

Quality Assurance Specialist	1	1	1
Training and Development Specialist	1	1	1
Payer	2	2	2
Fiscal Staff	3	3	~~3~~
Outreach Coordinator	2	2	2
Contracts Specialist	2	2	3

(D) **Ratio of qualified VR counselors to clients: [1:39]**

(E) **Projected number of individuals to be served in 5 years: [920]**

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	PY2020	PY2021	PY2022	PY2023	PY2024
Number Served	815	834	847	931	1,051
Number Determined Eligible	191	210	260	257	276
Pre-ETS Potentially Eligible	12	10	10	4	4
	PY2018	PY2019	PY2020	PY2021	PY2022
Number Served	913	870	815	834	847
Number Determined Eligible	224	176	191	210	260
Pre-ETS Potentially Eligible	12	17	12	10	10

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The projected number of individuals to be served in the 5 years is ~~920~~1,250 which would account for approximately a 10% – 20% increase each year, keeping consistent with the previous years. This would put SSB beyond the ~~913~~1,051 that was seen in ~~2018~~the most recent program year and is in line with the SSB Evolve: VR Initiate and outreach efforts. The current number of open cases at any

given time ranges between ~~675-690~~800 and 850. SSB saw a decrease in the numbers of customers determined eligible and served between 2018 and 2021 due to the COVID-19 Pandemic, then started to see a gradual increase beginning in 2021. SSB ~~is now back to~~ has now surpassed pre-pandemic levels of customers eligible per year and ~~approaching~~ pre-pandemic numbers of customers served per year. SSB does not serve a large number of Pre-ETS potentially eligible individuals per year with a current total of 4. This is due to the majority of students choosing to apply for VR services.

(2) Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

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- (A) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and 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.**

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
University of WI - Stout	Rehab Counseling	~~154~~ 8	~~151~~ 1
St. Cloud University	Rehab Counseling	~~25 first year students~~ ~~21 second year students~~ 14	~~11~~ 16

- (B) The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency 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.**

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SSB's recruitment and retention strategies include the following:

- Participating with the CSAVR Performance and Accountability committee to collectively review data, ideas, and best practices.
- Utilizing the findings from the Penn State study "Recruitment and Retention of State Vocational Rehabilitation Counselors: A Mixed Method Analysis" to inform our problem solving.
- Incorporating the strategies built into our Evolve VR project as it relates to personnel which is to:

- A. Develop a job vacancy outreach plan including connections with long-term training grant recipients and higher education programs,
- B. Implement hiring and referral bonuses,
- C. Establish a formal rehabilitation counselor internship program,
- D. Use our department Innovation Lab to work with counselors and their support staff to reimagine their roles,
- E. Re-evaluate and redesign the organizational structure to ensure we have the right roles with the right responsibilities to meet the needs of customers and the program, and
- F. Provide tuition reimbursement for staff interested in getting their bachelor's/master's degrees in vocational rehabilitation.

The overarching intent with these strategies is to:

- Foster a program, environment, and culture that talented and qualified professionals seek out and want to work for,
- Design an organizational structure that meets the needs of the program and the people we serve, and
- Restore the vocational rehabilitation counselor role to be a counselor, not a case manager.

(C) Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

- i. **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**
- ii. **Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.**

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All WDU staff members new to SSB receive Introduction to Blindness, ~~Visual Impairment~~Low Vision, and DeafBlindness —Phase 1 and Phase 2 Training on the essential aspects of blindness and ~~visual impairment~~low vision within three months of hire. Minnesota statutory language requires all Rehabilitation Counselors to successfully complete a minimum of 6 weeks of intensive training under supervision from an adjustment to blindness center. The 6 weeks of training provides classes in all curriculum areas of the training centers. The curriculum includes training in:

- Communication Skills including Braille and Assistive Technology Instruction,
- Travel Training,
- Independent Living Skills, including techniques of daily living and adaptive leisure instruction,
- Facilitated Structured Group Discussion on topics centering on the impact of blindness on employment, independent living, and social interactions, and
- Other Optional Training Activities which include achieving a personal goal agreed upon by the participant, their SSB supervisor, and staff of the approved vendor.

An example of the specific curriculum includes:

1. Communication Skills

- a. Fully understanding the importance and use of uncontracted and contracted Unified English Braille.
- b. Exposure to the uncontracted Braille alphabet and numbers using a slate and stylus, and orientation to the alphabet with the Perkins Brailier.
- c. Exposure to using speech output and magnification computer programs and devices.
- d. Identify the positives and negatives of various technology packages, what each does, and the functions they carry out, including operating systems, screen readers, magnification, and mobile technology.
- e. Identifying and using the Radio Talking Book and National Library Service play back equipment.
- f. Exposure to alternative methods of communication for DeafBlind individuals.

2. Travel Training

- a. Understanding the importance and use of the long white cane.
- b. Traveling without assistance using the long white cane in familiar areas, including crossing controlled and uncontrolled intersections.
- c. Using public bus and train transit, if available in the community.
- d. DeafBlind traveling techniques.

3. Independent Living Skills

- a. Independently place telephone calls.
- b. Using measurement tools and hand and power tools to construct a simple wooden item.
- c. Cleaning techniques which can include sweeping, cleaning furniture, vacuuming, etc.
- d. Telling time using non-sighted techniques (e.g., Braille watch, talking watch).
- e. Identifying coins and bills and using a check writing guide.
- f. Techniques for maintenance of household items.
- g. Managing one's wardrobe including coordinating items, identifying and sorting clothing, maintenance and cleanliness.
- h. Organizing kitchen cupboards and drawers to safely find and identify various cooking ingredients, supplies, and utensils.
- i. Preparing meals using basic kitchen tools (e.g., microwave, electric mixer, etc.) and essential food preparation and cooking techniques.
- j. DeafBlind Independent Living Skills.

4. Facilitated Structured Group Discussion

- a. Participating in discussions with other students and staff on topics centering on blindness, visual impairment, and DeafBlindness and its impact on employment, independent living, and social interactions.

5. Other Optional Training Activities

- 1.a. Achieving a personal goal agreed upon by the participant, their SSB supervisor, and staff of the approved vendor.

SSB and WDU specific staff also go through six weeks of onboarding after they come back from sleep shade training. Onboarding consists of 6 modules containing a multitude of reading, watching presentations, attending meetings, completing blindness and low-vision specific trainings online, competing activities, and passing quizzes. This includes meetings and completing activities with their assigned employment specialist and assistive technologist. They shadow assistive technology specialists to learn more about the work they do with customers. The new employee learns about not only vocational rehabilitation in terms of its history, but also SSB specific policies and procedures through activities, quizzes, and case study. The case study allows them to use their knowledge of the policies and procedures and implement that with a new system many are unfamiliar with called WorkForce One (WF1). This includes reviewing eye reports, uploading documents to the system, writing case notes, calculating Customer Financial Participation (CFP), completing vendor referrals, and more.

New Employee Onboarding Summary:

Module 1:

- Read policy chapters about General Requirements, Information & Referral, Informed Choice, Data Practices, Mandates Reporting and Case Documentation & Record of Service.
- Activities: Upload an accessible document to WF1, understand DRIVE Case Noting Framework, create case notes when given a scenario
- Quizzes: Is this Competitive and Integrated Employment?, Data Practices, Case Documentation

Module 2:

- Read policy chapters about referral, intake, and application, eligibility & OOS, Comprehensive Assessment & IPE Development, Comparable benefits, and Customer Financial Participation (CFP).
- Activities: Complete the "Frank Your Name Here" Case Study: Referral Intake & Application, Eligibility, Comprehensive Assessment & IPE Development, discuss comparable benefits for Frank, complete Frank's CFP
 - Techs do not complete IPEs. A supervisor creates that within the user profile they're working under.
- Staff Trainer begins scheduling meetings with colleagues around the office to build the new employee's network.

Module 3:

- Read policy chapters about general service provision, other services such as interpretation, maintenance, personal assistance, transportation, vehicle modifications, etc.
- Activities: calculate the cost of school with the Staff Trainer, complete three authorizations in WF1 for ATB, college tuition, and Metro Mobility
- Quizzes: Everything Around Service Provision, CFP and Schooling Quiz

- Staff Trainer continues scheduling meetings with colleagues around the office to build the new employee's network.

Module 4:

- Read policy chapters about Pre-ETS, Translation Services, Subminimum Wage, and Vendor Guidance.
- Activities: Completing a referral for Frank, and leaning more about Pre-ETS by reading the Marc Marcus Case Study and completing an ROI, Pre-ETS authorization, and grade uploading for Marc.
- Staff Trainer continues scheduling meetings with colleagues around the office to build the new employee's network.

Module 5:

- More policy reading.

Module 6:

- Learning about other disabilities and resources, like our WF1 Connect Mobile App, autism, neurodivergence, traumatic brain injuries, etc.

New employees are also asked to meet with their team and read and analyze corresponding policy chapters for each individual on their team to understand how their team works, the responsibilities of each team member, and what individual customers may need from the team at any given time, for any customer. Additionally, a weekly newsletter highlighting upcoming opportunities for internal and external trainings and webinars that relates to vocational rehabilitation, accessibility, health and wellness, etc. is sent to current staff so they can keep up to date on skills, research, and also Certified Rehabilitation Counselor (CRC) continuing education units, if they so require. Staff may request, for development purposes, additional or more advanced training activities that will be considered on a case-by-case basis and reflect organizational needs and resources.

In collaboration with other offices of the Department of Employment and Economic Development (DEED), SSB utilizes a collaborative model when looking at employee performance and creates a dialogue between supervisor and staff. Together, they establish goals for the upcoming year and put plans into place that will help the individual reach those goals. A final component is completing a review of any essential professional and employment-related training that is either desired by the employee or required by the employer. Ongoing in-service training offerings give employees a wide variety of options for enhancing and improving skills. This new DEED department-wide initiative calls for employee led Individual Development Plans (IDP) that are organized into two main categories: Skills and Professional Development, and Inclusive Customer Service (for employees) or Inclusive Leadership (for people leaders).

WDU Annual Training Plans are developed and updated every year in August to share ideas and plan trainings for the next year. They include ideas for the WDU Quarterly Meetings, online accessible training platform YesLMS, and Counselor-Only Training Sessions (COTS). Future areas of focus for training include:

- Supported Decision Making
- Person-Centered Practices
- APH ConnectCenter
- HIPAA and Customer Confidentiality
- Readyng an Eye Report (COTS)

The Counselor-Only Training Sessions (COTS) are held monthly with varying scheduled topics, speakers, or dedicated time for counselors to connect, help each other, and share resources. The COTS are informal and an excellent team building opportunity. WDU Quarterly Meetings are held 3-4 times per year with varying topics including speakers, WDU updates, new employee introductions, etc. All WDU staff are expected to attend the meetings or review the recordings which are posted to the unit's SharePoint site.

Additional DEED Human Resources requires mandatory annual trainings for all employees. Some employees may be asked to complete additional trainings based on their role or leadership authority. Most employees complete the following trainings:

- Code of Ethics
- Appropriate Use of Electronic Communications
- [Protecting Personal Information: Federal Tax Information \(FTI\)](#)
- [Protecting Personal Information: SSA](#)
- [Respectful Workplace Training](#)
- [Principles of Implicit Bias](#)
- Prohibition of Harassment and Discrimination
- Security Awareness
- Preventing Sexual Harassment
- Workplace Violence
- Acknowledgements:
 - Code of Ethics
 - Mobile Device Use Policy
 - Workplace Violence Prohibited Policy

In 2021, the WDU created a full-time staff training position to develop accessible online training curriculum to ensure staff understand and apply federal and state policies, agency expectations and standards, and strategic goals and initiatives. The trainer modified existing curriculum to meet the needs for onboarding new staff, addressing ongoing training and development needs of staff requiring remedial or corrective training, and facilitation of unit wide training sessions on a regular basis. The trainer is utilizing SharePoint and other electronic methods for sharing on-going information and opportunities for staff development through other available resources. SSB's accessible electronic training platform, YesLMS, is an example of a resource available to staff where free optional or required training can be accessed. In addition, staff use the policy management system, DocTract, for reading policies during onboarding, for ongoing training, and whenever they need to reference policies and procedures. We expect this outcome will result in stronger foundational competencies for new staff and overall higher levels of consistency and application of program requirements and service provision.

SSB has begun collaborating with Vocational Rehabilitation Services (VRS) to provide training to staff and Community Partners to ensure staff are aware of best practices in the VR and blindness education fields. Agency combined trainings on the new E1MN initiate and E1PBA was an example of this new higher level of collaboration with VRS.

SSB collaborates with technology vendors who provide demonstrations to staff on new products and devices. SSB assistive technology specialists are encouraged to attend assistive technology conferences, so they may stay current on the latest technology available in the field and share that knowledge with other SSB staff. Additionally, SSB has a Technology Resource Lab that is kept up to date with current technology so customers and staff can have hands on experience with it.

SSB is also very fortunate to have a library within our Department of Employment of Economic Development (DEED). Specialized library services provide SSB and VRS with a weekly *DEED Library Alert* which is a service to inform staff of news, research, and developments of interest.

(3) Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—

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- (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**
- (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.**

Policies and procedures are in place relating to the establishment and maintenance of standards to ensure personnel needed by SSB are appropriately and adequately prepared and trained. Such policies and procedures, including negotiated labor agreements with exclusive bargaining representatives, also cover the selection, retention, development, and termination of staff employed by SSB, and includes requirements of State law concerning the classification of SSB positions by Minnesota Management and Budget.

The academic degree standard for a vocational rehabilitation counselor at SSB is the master's degree in rehabilitation counseling or a closely related field, with graduate-level coursework in each of the following: theories and techniques of counseling; medical/psycho-social aspects of disability, assessment, and occupational information or job placement.

SSB works closely with its Human Resources to ensure only those individuals who have earned a master's degree in rehabilitation counseling, or a closely related field, qualify for placement on eligible lists for rehabilitation counselor. Therefore, all counselors fully meet the position standard and SSB does not have any expenditures for staff training to obtain a graduate degree in rehabilitation counseling. SSB does not anticipate any factors that would adversely affect the ability to hire qualified staff.

SSB does not require Certified Rehabilitation Counselor (CRC) certification; however, several staff have obtained and maintain this credential. Management recognizes the importance of professional affiliations and provides in-house and external opportunities for training with CRC continuing education units available.

New employees come to SSB with a variety of knowledge, skills, and abilities. Nearly all need SSB to provide them with additional information and training to ensure they have the tools and resources to do their job. Minnesotans expect SSB to be "experts" in the field of blindness, low vision, and DeafBlindness. We are the one public organization providing such services.

Therefore, SSB has an obligation to train staff on the essential aspects of blindness, ~~visual impairment~~low vision, and DeafBlindness. To meet that expectation, SSB has a comprehensive training program consisting of:

- Introduction to Blindness, ~~Visual Impairment~~Low Vision, and DeafBlindness —PHASE I. Responsibilities of SSB staff do vary, but there are minimum requirements for all positions and are part of this course which is required of all new employees.
- Introduction to Blindness, ~~Visual Impairment~~Low Vision, and DeafBlindness —PHASE II. "Under the blindfold" and with simulators are training activities which will be required of some new staff as determined by SSB management.

- Continuing Education in Blindness, ~~Visual Impairment~~Low Vision, and DeafBlindness —PHASE III. Training consists of specialized and ongoing training related to blindness and vision loss and will be required of staff as determined by SSB management.

SSB ensures that personnel understand the evolving labor force. Minnesota's Labor Market Information Office within the Department of Employment and Economic Development (DEED) collects employment, wage, and industry information from throughout the state, then analyzes it to provide information employers and others can use to make decisions and plan. SSB uses the Labor Market Information Office to provide labor market training to its personnel. Other opportunities exist for staff to participate in training such as: area or city specific Business Engagement Networks or other specialized trainings.

(4) Method(s) the VR agency uses to ensure that personnel 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.

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SSB assures that all materials are available to staff in their desired format. Print material is made available to staff in braille and other alternate formats such as print in native language, large print, and electronic. SSB is fortunate to have Braille and Audio services onsite and can produce high quality Braille and digital recordings in short timeframes. Minnesota is also fortunate to have several spoken and written language transcription services as well as American Sign Language and Tactile Sign Language interpreter services available who contract with the State for use with non-English speaking individuals and/or DeafBlind individuals. Communication Access Real-time Translation (CART) services is another available option through state contract to ensure communication access.

(5) 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.

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- SSB regularly provides optional and required in-house staff training in the areas of Pre-ETS and working with youth to ensure all staff receive appropriate and adequate training and continuing education including any additional guidance provided by RSA. Additional training opportunities outside of SSB are encouraged and supported.
- Counselors may be asked to make presentations at staff meetings in areas of their expertise which include DeafBlind best practices, person centered services, motivational interviewing, and transition best practices.
- SSB employment, assistive technology, and counseling staff work with other Minnesota state departments on the hiring and integration into their workplaces of blind, visually impaired, and DeafBlind individuals as part of achieving the Minnesota Governor's executive order for increasing the number of employees with disabilities in the state government workforce.
- SSB staff provided training to educators on the Employment First Minnesota (E1MN) initiative, which activate interagency collaboration for student success.
- SSB staff participated in monthly trainings for educators through state-wide communities of practice, Minnesota Access Center Office Hours, (sponsored by Minnesota Department of Education), regional meetings hosted by regional low-incidence facilitators, and other state-wide professional conferences and workshops.

- SSB has a Pre-ETS resources toolkit for counselors state-wide. The toolkit lists specific resources in each of the five required Pre-ETS activities.
- SSB collaborates with Work-Based Learning Coordinators to better align the schools' work planning and the vocational rehabilitation program.
- The Work Opportunity Navigators will train and consult with employers to provide guidance about adding student interns and workers who may be blind, visually impaired, and Deafblind to their workforce.

COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)

(i) Coordination with Education Officials. In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act—

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- (1) Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.**

Throughout the State of Minnesota, we are committed to providing students with disabilities Pre-ETS to meet their needs. VR ~~transition~~ services assist eligible youth to plan for and make the ~~transition shift~~ from secondary school to competitive integrated employment. SSB staff attend IEP and IEP 3-year evaluation meetings and collect these documents for review to coordinate with team members and provide services in collaboration with IDEA. SSB staff work with students and their families, IEP case managers, teachers of the blind and visually impaired, orientation and mobility specialists, and other IEP team members to supplement services provided by IDEA in order to assist with goal acquisition. SSB is able to provide additional activities outside of the classroom and school day through in-house service provision and community partners to strengthen and reinforce IEP goals needed for high school success and preparedness for the workplace. SSB staff consult with IEP members when providing additional activities that supplement IEP activities and align with IPE goals to ensure understanding of instruction from both agencies.

SSB's Pre-ETS ~~and Transition~~ Coordinator attends Statewide Vision Network meetings hosted by the specialist for the blind/visually impaired (BVI) with the Department of Education to stay engaged and up to date on BVI instruction throughout the state. They sit on the BVI Advisory Committee to collaborate and develop additional opportunities for students in and out of the classroom. The Pre-ETS ~~and Transition~~ Coordinator and other SSB staff, as appropriate, also attend the annual Minnesota Division on Vision Impairments TBVI and COMS Conference in the fall every year to network and collaborate with teachers statewide.

Technical Assistance and Consultation DEED's VRS and SSB and MDE's Special Education and Career and College Success staff will provide technical assistance and consultation regarding these five required pre-employment ~~transition~~ Pre-ETS services made available to students with disabilities who need them in grade nine until the 22nd Birthday statewide:

- Job exploration counseling to assist students with disabilities in understanding their work-related strengths and interests and what career possibilities there are.
- Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment in the community to the maximum extent possible.
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education.
- Workplace readiness training to develop social skills and independent living.
- Instruction in self-advocacy (including instruction in person-centered practices), which may include peer mentoring (including peer mentoring from individuals with disabilities working in competitive, integrated employment).

Partnership with SECCSD DEED's VRS and SSB and MDE's Special Education and Career and College Success Divisions agree to share responsibility for ensuring that schools are aware of, and how to use, the tools to support students with disabilities need to receive current information about their strengths, interests, and preferences in order to make informed choices about competitive integrated employment prior to leaving school. DEED's VRS and SSB and MDE's Special Education and Career and College Success Divisions agree to share responsibility for ensuring that schools which serve students with disabilities receive information about the benefits of providing career information.

DEED-VRS and SSB are partners with the Minnesota Departments of Education (MDE) and Human Services (DHS) in the Employment First Minnesota (E1MN) effort. E1MN works toward a seamless system of employment services and supports being available to all persons with disabilities, including students. State-level leadership and staff meet regularly to plan for training, technical assistance, resource development, and problem-solving related to collaboratively serving students and adults with disabilities. E1MN efforts are focused on eliminating barriers for accessing services and supports needed to prepare for, find, keep, and advance in competitive integrated employment.

This year E1MN partners created a Minnesota Transition Framework which defines high-quality transition programming, and a Youth in Transition Toolkit (housed on the Disability Hub MN website) which supports the framework. The toolkit is a one-stop shop for professionals to learn about the Transition Framework, understand the basics for transition programming (i.e., laws, roles, agency plans and policies), and get resources and tools to serve youth/students and families.

Furthermore, E1MN is planning for a new structure for regional work between the three agencies and local professionals that provide transition services to students with disabilities, which will launch in early 2024. The goal is to invite all school, VR, waiver, and employment service provider staff in each region to learn about the Minnesota Transition Framework and Youth in Transition Toolkit, to assess where they are at with transition programming, and create plans for improvement. State staff will provide training and technical assistance to teams as they implement their plans.

MSIC - Coordinated services for youth in special education. Minnesota law mandates a coordinated system of services for youth from birth to the 22nd birthday, who are enrolled in special education programs. The Minnesota System for Interagency Collaboration (MnSIC) was formed to develop and implement this system. SSB staff participate on subcommittees that develop service strategies for students and recommendations for governance, and coordination of, state and local collaborative efforts.

CTIC - Approximately 70 local CTICs promote statewide interagency coordination to remove system barriers and expand community services. CTICs include parents, students, advocacy groups, local businesses, county government, postsecondary education, vocational education, community education, corrections, SSA health care, and other local service providers. SSB staff serve on CTICs, thereby helping to improve and expand vocational services that result in employment outcomes.

Serving all public, private, and charter high schools in Minnesota - SSB counselors are active participants on transition planning teams so that each eligible or potentially eligible student with a disability can access VR services. DEED's VRS and SSB counselors attend meetings for the development of Individualized Education Programs (IEPs), when invited. Counselors will use the IEPs with students to assist in developing the individualized plans for employment (IPE).

Outreach - Outreach efforts include working with school nurses, guidance counselors, case managers, principals, social workers, 504 personnel, community agencies, and work experience coordinators to identify students with disabilities who are not in special education programs. For SSB, connecting with students through teachers of the blind and visually impaired is a primary way to ensure that we are serving students. A referral of all potentially eligible students is sought as soon as possible to ensure employment services can begin well before the student leaves school.

Assistive Technology On an annual basis, the MDE Assistive Technology Steering Committee submits a request for technology to SSB for the MDE lending library. This lending library is located at the Minnesota State Academy for the Blind and is available for transition-aged students who are blind, low vision, or DeafBlind to use as part of their pre-employment transition services. In addition, when a student with a disability transitions into a work environment or postsecondary program, SSB may purchase any assistive technology device that the SSB's former school district purchased on the child's behalf.

- (2) **Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:**

- (A) **Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;**
- (B) **Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and**

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- implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;
- (C) The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;
 - (D) Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;
 - (E) Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and
 - (F) Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

Vocational Rehabilitation Services (VRS), State Services for the Blind (SSB), and Minnesota Department of Education (MDE) have a memorandum of understanding (MOU) to achieve better coordination between schools and VR services and to create a bridge from the school to VRS or SSB prior to school exit. The intent of the agreement is to:

- Provide consultation and technical assistance to Local Education Agencies (LEAs) in planning for the transition of students with disabilities from school to post-school activities including postsecondary education, training, competitive integrated employment, and independent living.
- Provide secondary transition planning by DEED personnel alongside secondary special education and career and college readiness staff through the delivery of pre-employment transition services and vocational rehabilitation services under the Rehabilitation Act and transition services under the IDEA.
- Define the roles and responsibilities, including financial responsibilities, of each agency, including provisions for pre-employment transition services, vocational rehabilitation services, and IDEA transition services.
- Designate procedures for outreach to, and identification of, students with disabilities who are in need of pre-employment transition services and/or vocational rehabilitation services. Outreach to students should occur as early as age 14.
- Outline services and documentation requirements set forth in section 511 of the Rehabilitation Act, as added by the Workforce Innovation and Opportunity Act (WIOA), regarding youth with disabilities who are seeking subminimum wage employment.
- Provide assurance that neither the SEA nor the LEA will enter an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.

(k) Coordination with Employers. In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

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SSB works with employers to identify employment and career exploration opportunities in competitive and integrated settings. SSB has four employment specialists who work with employers to identify their needs in finding, attracting, and retaining an inclusive workforce. Employment Specialists partner with employers to find qualified candidates, as well as provide education on creating a diverse workforce, worksite analysis, training on disability employment-related topics, identifying improvements to promote inclusive hiring practices, providing information and referrals to other title partners, and job retention services for employees with a vision loss.

SSB employment specialists routinely attend and develop networking events to promote disability awareness and inclusivity training, as well as provide resources and technical assistance to employers in Minnesota and nationwide. SSB staff presented to State of Minnesota agency senior leadership and national and regional company leaders on the advantages of hiring people who are blind, visually impaired, low vision, and DeafBlind. SSB provided business services to recruit, onboard, and retain individuals with disabilities to multinational, national, and local employers. Education to employers includes how to recruit, onboard, and retain qualified candidates by creating and maintaining an inclusive and disability-friendly workplace through services like worksite assessments, resources, and technical assistance such as on-site accessibility testing of employer computer systems and data bases, in addition to information accessibility support, at no charge. Providing these services to businesses helps support relationships with employers and enhance the exchange of labor market information to assist in the development of individual plans for employment and self-employment decision making.

SSB actively participates and provides leadership and guidance to local and national groups devoted to connecting employers to qualified individuals with disabilities in cooperation with other DEED entities and title partners related directly to services to businesses. This is done through the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the CSAVR National Employment Team (NET), Statewide Business Engagement Networks (BENs), Chambers of Commerce, national self-employment networking and policy-making groups, and Disability: IN. In return, the state provides advance communication of employment opportunities, improved communications about the State's employment processes, assistance with practice interviews, and training to improve candidate performance in the hiring process. Various partners participate in career fairs, community outreach events, job information sessions, training sessions, resource sharing, and more. SSB staff routinely partner with other State of Minnesota agencies to provide training and modules for employers statewide. This includes partnering with the Department of Labor's Apprenticeship Office, America's Job Center, and other title partners. SSB staff participated in the development of online virtual learning modules available to all employers statewide on Minnesota's America's Job Center labor exchange website, titled Bite Sized Learning Modules. These modules are specific to employers and were developed following a period of input from Minnesota businesses.

The NET through CSAVR is comprised of one point of contact for each of the 78 rehabilitation programs nationwide. The sole purpose of this team is to connect with employers on a national level including private employers and federal partners. The NET enables SSB to connect with new

employers monthly and receive correspondence and job leads from twelve or more employers each month. Each year, SSB has customers hired by employers through NET employer connections. SSB also frequently acts as the subject matter expert and resource for other state programs that connect directly to employers across Minnesota. SSB utilizes the relationships with these business partners to supplement the efficiency of contracted Community Rehabilitation Providers, giving more than six one-on-one presentations with employers last year.

The Pre-ETS ~~and transition~~ team at State Services for the Blind is comprised of a Pre-ETS ~~and Transition~~ Program Manager, VR counselors specializing in Pre-ETS ~~and transition~~ services, a Pre-ETS ~~and Transition~~ Coordinator, Work Opportunities Navigators specifically serving students and youth, an assistive technologist, support staff, and additional specialists, including Orientation and Mobility instructors and job coaches (these specialists serve students and adults).

SSB has implemented a model for transition called BRIDGE to Success that is implemented with all eligible and potentially eligible transition students. BRIDGE encapsulates SSB's philosophy upon which our youth services are built. BRIDGE stands for:

- Basic Skills
- Role Models
- Initiative
- Discovery
- Goal Setting
- Experiences

In particular, our team connects with employers to provide job exploration counseling and work-based learning experiences.

Job exploration counseling: SSB's Work Opportunity Navigators reach out to community employers to identify job shadows and job tours to facilitate career exploration for students. SSB's Pre-ETS ~~and Transition~~ Coordinator facilitates a Career Expo event, where blind, low vision, and DeafBlind employees from various sectors of the workforce come together and network with students about their journey to employment and working in the community. SSB staff connects with employers to gain an understanding of what occupation needs are open in their business and network to match students with employers for informational interviews. Work Opportunity Navigators bring students into businesses to talk with employers and to network with employers by learning about job openings and in demand community occupations, while coaching students on networking and professionalism skills needed when approaching potential employers.

Work-based learning experiences: Transition Navigators connect with employers to identify work opportunities that are available for students. SSB's ~~transition~~ Pre-ETS team connects students with regional work programs, such as Step Up for students in Minneapolis and BrookLynk for students in the northwest metro. Students work with internal SSB staff and community rehabilitation providers to engage in work experiences from volunteering, to obtaining internships. Work Opportunities Navigators, Pre-ETS ~~and Transition~~ Coordinator, and counselors compile a list of summer internship opportunities in the community and then conduct targeted outreach to students who qualify for various opportunities. SSB staff let students know about the opportunities, as well as assists with applications.

SSB Work Opportunity Navigators support students through orientation and training when work opportunities are developed. SSB staff members engage in the interactive process between students and employers to help address and problem-solve accessibility barriers that may present

in the workplace to ensure students' success and employers' understanding of how to accommodate and work with the strengths of students. For example, SSB has two in-house job coaches who connect with employers to provide workplace readiness training and job coaching when a need arises during a work-based learning experience. For students who need more frequent support, SSB works with community partners to authorize those services. SSB staff connects with managerial staff to check in and follows up after work experiences are underway to ensure student success and development throughout work experiences.

SSB participates in Project SEARCH, which is a state-wide business-led collaboration that enables young adults with disabilities to gain and maintain employment through training and career exploration.

A 9–12-month program, Project SEARCH provides total immersion in a large community business. Students with disabilities are offered a workforce alternative for their last year of high school.

The Project SEARCH partnership includes a local host business, a school, VRS/SSB, a Community Service Provider, and a disability services agency. The business provides an on-site training classroom, business liaison, and rotational internships for on-the-job training. The school provides an instructor and job skills trainer(s).

(I) Interagency Cooperation with Other Agencies. In accordance with the requirements in section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

(1) State programs (designate lead agency(ies) and implementing entity(ies)) carried out under section 4 of the Assistive Technology Act of 1998;

The Minnesota STAR (System of Technology to Achieve Results) Program, a program within the Minnesota Department of Administration, is funded by the Department of Health and Human Services in accordance with the Assistive Technology Act of 1998, as amended. SSB often refers people to STAR for a device demonstration. This allows customers to compare benefits and features of a particular device, or category of devices. Once a decision on a device is made, the person can borrow the device for 30 days to make sure it meets their needs before SSB purchases the item. SSB and VRS has an executed Memorandum of Understanding (MOU) with STAR to provide assistive technology specialists with commonly used devices for use in doing assessments with customers. During this next Combined State Plan period, there is a plan to update and refresh the MOU, as it has been some time since the last version was drafted.

(2) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

There currently is no formalized working relationship between the Department of Agriculture and State Services for the Blind. The Minnesota USDA Rural Development Office does use technical economic and forecasting information provided by DEED to develop and market its services.

(3) Non-educational agencies serving out-of-school youth;

SSB does not have any cooperative agreements with agencies serving out-of-school youth.

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(4) State use contracting programs;

Since the mid-1990s, Minnesota state agencies have been legislatively encouraged to purchase goods and services from small businesses operated by individuals with disabilities. In 2007, the Legislature enacted a set-aside program, providing that 19 percent of the total value of all state janitorial contracts be awarded to community rehabilitation organizations approved by VRS as service providers under the VRS Extended Employment Program. During the 2010 legislative session, the set-aside program was expanded to include document imaging, document shredding, mailing, collating, and sorting services. Further, the amount of each contract awarded under this section may exceed the estimated fair market price for the same goods and services by up to 6 percent. SSB has utilized these contracting programs in the past when we transitioned to an entirely electronic system and required mass document scanning, collating, and shredding services.

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(5) State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

The State Medicaid plan under Title XIX of the Social Security Act; Medical Assistance, the state's Medicaid program, is administered by the DHS Disability Services Division (DHS-DSD). Vocational Rehabilitation Services (VRS) and State Services for the Blind (SSB) collaborate closely with DHS in the provision of services for individuals who are on home and community-based waivers. In September 2019, DHS-DSD, VRS, and SSB signed a Memorandum of Understanding. The terms of the MOU are specific to individuals on a Medicaid waiver who are interested in competitive, integrated employment. Employment First and Person-Centered principles form the basis of the shared vision for how DEED-VRS/SSB and the Medicaid agency agree to provide employment services for people with disabilities in a coordinated manner.

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The purpose of the MOU and interagency cooperation is to align systems so that common customers – those who receive home and community-based service disability waivers and vocational rehabilitation services from VRS or SSB – can get seamless and timely supports to make informed choices and meet their competitive, integrated employment goals. Implementation of the MOU agreements began July 1, 2021. DEED-VRS/SSB and the Medicaid agency developed communication, stakeholder involvement, training, and resources prior to launch to ensure understanding of the responsibilities for each party supporting the person on a Medicaid waiver. Under the MOU, the following coordination of services occurs:

Payment of Services DEED-VRS/SSB is the primary payer for job-related services (services supporting job development, placement, and employment stability) for common customers. Once employment stability is established, DHS-DSD will continue to pay for long-term supports to maintain employment for customers of all ages. DHS-DSD will also pay for services that assist people in making informed choices and developing informed employment goals.

Interagency Planning and Policy Development DHS-DSD and VRS/SSB will use strategic planning, troubleshooting, consultation, and technical assistance to ensure successful implementation of this agreement. Key areas include goal setting, systems development, coordination of services, quality assurance, data collection, and stakeholder involvement. We will:

- Meet as an interagency steering committee to provide MOU oversight, set goals, review program services and financing options, identify promising practices, and resolve disputes.

- Support program liaisons from VRS/SSB and DHS-DSD to coordinate joint efforts in communication, quality assurance, training, and coordination of services, policies, and procedures.
- Create work groups as needed to provide advice and share expertise regarding practice enhancements.
- Hold periodic staff meetings across agencies to ensure coordinated communication and address policy issues.
- Establish an advisory committee that includes stakeholders from VRS/SSB, DHS-DSD, lead agency, and providers of both vocational rehabilitation services and waiver services to discuss progress and challenges with the MOU.
- Collaborate with stakeholders to collect feedback and identify areas for improvement.
- Understand employment outcomes in our respective programs and develop a shared understanding of outcome measures and reporting procedures.
- Promote the use of evidence-based practices and/or promising approaches to create a more closely aligned employment service system, increase quality, and gather shared data on employment outcomes.
- Identify common customers and practices that support positive employment outcomes.

Eligibility, Referrals, and Customer Flow DEED-VRS/SSB and DHS will continue to implement and refine the processes and practices developed under the Engage, Plan, Find, Keep framework. This includes promoting regional and local collaboration, E1MN training curriculum, and the tools and resources to support this work on the Disability HUB work toolkit.

Service Provider Networks DEED-VRS/SSB and DHS will continue to work together to increase our statewide, shared network of employment service providers to improve access, support seamless transitions, and expand individuals' choices to high quality employment services. As part of this work, we agree to:

- Evaluate strategies for a common employment service provider pool. We will continue to explore options for creating a shared job search service provider pool to support seamless service delivery and prevent unnecessary interruptions as people move between supports funded by VRS/SSB and supports funded by DHS-DSD.
- Encourage dual enrollment of employment service providers. While DHS and DEED will continue to maintain separate employment service provider licensure/accreditation standards, we will make it easier for providers to understand our respective standards and develop strategies to provide ongoing communication and technical assistance to those interested in enrolling.
- Align and streamline processes and efforts. We will explore opportunities to better align and streamline each agency's business processes and requirements to create consistency and efficiencies for dually enrolled employment service providers.
- Coordinate communications and training. We will coordinate service provider communications and training to maintain consistent messaging and increase understanding of each agency's respective system and the shared customer flow outlined in this agreement.
- Measure and promote provider performance. We will explore methods to assess and provide information on service provider performance to people with disabilities and their families to support informed selection of service providers.

- Develop new providers. We will analyze data, set goals, and collaborate on the development of employment service providers in underserved populations and areas of the state.

(6) State agency responsible for providing services for individuals with developmental disabilities;

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The primary Minnesota agency responsible for services for individuals with developmental disabilities is the Department of Human Services (DHS).

In Minnesota, the Governor's Council on Developmental Disabilities serves to advocate for all persons with developmental disabilities by carrying out activities in major areas of emphasis.

Minnesota's Olmstead Plan supports freedom of choice and provides a framework and a series of key activities that must be achieved to ensure Minnesotans with disabilities have opportunities to live, learn, work, and enjoy life in the most integrated setting desired by the person. Former Governor Mark Dayton appointed an Olmstead Subcabinet to develop and implement this plan. The Subcabinet consists of representatives of the MnSIC agencies listed above, the Housing Finance Agency, the Department of Transportation, the ombudsman for mental health and developmental disabilities, and the executive director of the Governor's Council on Developmental Disabilities.

SSB coordinates services with DHS's lead agencies, which are responsible for supported employment and waiver services for individuals with developmental disabilities. This is done following the E1MN framework. SSB partners with the Governor's Council on Developmental Disabilities as it relates to advocacy of policy initiatives that support the equality and rights of people with developmental disabilities. For instance, SSB was a partner in the Inclusion Mobile Museum, which is traveling exhibit that celebrates the journey from 1900 to the present to increase the independence, productivity, self-determination, integration and inclusion of Minnesotans with developmental disabilities and their families.

(7) State agency responsible for providing mental health services;

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The Minnesota Department of Human Services (DHS) is responsible for coordinating mental health services for adults and youth. Minnesota's Mental Health system is a state mandated, county operated system. The State Mental Health Authority is responsible for ensuring that Minnesota's 87 counties, the local mental health authority, provide an array of community mental health services including: basic clinical services, community services and supports, hospitalization and residential treatment. Funding for Minnesota's mental health system comes from health care insurance, including Medicaid, private insurance, and MinnesotaCare, as well as county and local tax levy funds, state mental health funds, and Federal Block grant funds. Minnesota's Mental Health and Drug and Alcohol Divisions merged to provide a combined state administration for adult and children's mental health and alcohol and drug abuse. The emphasis is on moving to integrated care approaches.

SSB coordinates with DHS's lead agencies, which are responsible for these mental health services. Typically, we refer individuals to these programs if they are not already associated with them. At that time, an assessment is done and an [Adult Rehabilitative Mental Health Services case worker](#) may be assigned. ARMHS is a range of services that helps an individual develop and enhance psychiatric stability, social competencies, personal and emotional adjustment, and independent living and community skills. Whether the person is

returning home from a state hospital or working to improve their skills at independent living, ARMHS meets each person with mental illness where they are at with services tailored to them. These services are often included on the IPE and are woven into all planned services.

(8) Other Federal, State, and local agencies and programs outside the workforce development system; and

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Following is a discussion of State Services for the Blind's collaborative arrangements with federal, state and local agencies and with private entities that are not formal components of the statewide workforce investment system.

Olmstead Subcabinet - The Department of Employment and Economic Development (DEED) is active on the Governor's subcabinet to implement the Olmstead Plan that was approved by the U.S. District Court on September 29, 2015. The subcabinet "embraces the Olmstead decision as a key component of achieving a better Minnesota for all Minnesotans and strives to ensure Minnesotans with disabilities will have the opportunity, both now and in the future, to live close to their families and friends, to live more independently, to engage in productive employment and to participate in community life" (2013 vision statement). The employment section of the plan listed two population-level indicators: 1) Increase the employment rate of persons with disabilities so it is comparable to the employment rate of persons without disabilities and 2) Increase the employment earnings of persons with disabilities so they are comparable to the earnings of persons without disabilities.

Disability Agency Forum - SSB is an active member of the Disability Agency Forum, which is a group of small disability organizations throughout Minnesota. Representation includes Commission for Deaf/HOH/DB, Deaf and Hard of Hearing Services, Minnesota Council on Disability, Governor's Council on Developmental Disabilities, STAR, Office of Accessible Technology, Olmstead Implementation Office, and SSB.

Technically Accessibility Advisory Committee - SSB provides representation on the TAAC, which is a group that assists with the accessibility of technology throughout the State of Minnesota.

Minnesota Council on Disability - SSB provides ex-officio membership to the Minnesota Council on Disability (MCD). MCD's mission is to serve people with disabilities in Minnesota through development of effective policy, training, technical resources, and collaborations with public and private stakeholders. Their vision is "a barrier-free Minnesota where every person with a disability has full access to all aspects of life."

Statewide Independent Living Council - SSB is an ex-officio member of the SILC. The Minnesota Statewide Independent Living Council (MNSILC) provides statewide planning and policies necessary to provide independent living services to people with disabilities.

Cooperative agreements with the White Earth Nation Tribal VR program and the Red Lake Nation Tribal VR program - VRS and SSB provide information, technical assistance, training opportunities, and support to the state's two tribal VR programs. A formal process is in place for referral and transfer of cases in accordance with best practices ensuring choice. Although not a part of the formal written agreement, the Social Security Administration's Area Work Incentive Coordinator plays a crucial role in providing technical assistance on benefits planning.

Professional Vocational Rehabilitation Counseling Organizations - Active participation relating to ongoing professional development for staff and to counselor recruitment takes place through well-established working relationships with, and memberships on, the boards of the Minnesota Rehabilitation Association, including the Minnesota Rehabilitation Counseling Association chapter.

(9) Other private nonprofit organizations.

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SSB holds master contracts with three full-time Community Rehabilitation Providers (CRPs) that are considered private, nonprofit organizations. As of January 2024, one of those CRPs closed their doors for an undetermined time for program restructuring. These contracts focus on providing adjustment to blindness training and employment related services, as well as other services to blind, ~~visually impaired~~ low vision, and DeafBlind customers. SSB discusses with providers during the development of master contracts the scope of services, programs, and rates.

As required by statute, SSB contracts with CRPs to provide the minimum of six weeks intensive training under supervision from an adjustment to blindness center for rehabilitation counselors. As of mid-2023, all three CRPs in the Minnesota are able to provide this training. Contracts have also been developed with CRPs to provide transition programs to students. Services are meant to augment work done by school districts with activities on evenings and weekends.

Additionally, SSB continues to implement our "Community Partner + SSB Staff Forums" four times per year as an opportunity to provide updates about agency happenings, discuss trends in findings from monitoring visits, and provide training on pertinent topics such as data practices, navigating the state system for job placement, and Customized Employment.

VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES

CERTIFICATIONS

States must provide written and signed certifications that:	
1.	The Department of Employment and Economic Development 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 title IV of WIOA, ² and its State Plan supplement under title VI of the Rehabilitation Act;
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). 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 or the designated State unit when the designated State agency has a designated State unit) ³ agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan ⁴ , the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations ⁵ , policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) 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;
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 or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan ⁶ , the Rehabilitation Act, and all applicable regulations ⁷ , 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;

² Public Law 113-128.

³ All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

⁴ 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.

⁵ 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 at 34 CFR part 361.

⁶ 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.

⁷ Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363.

States must provide written and signed certifications that:	
4.	The designated State unit, or if not applicable, the designated State agency 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, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
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 Director of Minnesota State Services for the Blind 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;
8.	The Director of Minnesota State Services for the Blind has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
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.

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, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:	
1.	Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2.	Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation

The State Plan must provide assurances that:	
	Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.
3.	Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. (b) either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. (d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3). (e) as applicable, 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. (f) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. (h) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act. (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. (l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).

The State Plan must provide assurances that:	
	(m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4.	Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will: (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act. (b) impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act. (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act, as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act. (d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. (e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. (f) comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act. (g) provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. (h) comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act. (i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs. (j) with respect to students with disabilities, the State: (i) has developed and will implement, (A) strategies to address the needs identified in the assessments; and (B) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and

The State Plan must provide assurances that:	
	(ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113). (iii) shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5.	Program Administration for the Supported Employment Title VI Supplement to the State plan: (a) The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act. (b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6.	Financial Administration of the Supported Employment Program (Title VI): (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)(H) and (I) of the Rehabilitation Act. (b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7.	Provision of Supported Employment Services: (a) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. (b) The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded

The State Plan must provide assurances that:	
	under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

	Vocational Rehabilitation Program Will be Completed in May 2024 after Negotiations of Performance Indicators with The Rehabilitation Services Administration (RSA)			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) ²²				
Employment (Fourth Quarter after Exit) ²²				
Median Earnings (Second Quarter after Exit) ⁸				
Credential Attainment Rate				
Measurable Skill Gains				

	All WIOA Core Programs			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers				

Additional Indicators of Performance
1.
2.

3.
4.

GEPA Requirements

GEPA 427 Form Instructions for Application Package - Vocational Rehabilitation

- 1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
- 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
- 3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
- 4. What is your timeline, including targeted milestones, for addressing these identified barriers?

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

At Minnesota State Services for the Blind (SSB) under the Department of Employment and Economic Development (DEED), we are committed to cultivating a culture that encourages collaboration, flexibility, and fairness to enable all individuals to contribute to their full potential. Our mission, philosophy, and values embody equitable access to, and participation in, the Vocational Rehabilitation Program. We have Accessibility Champions imbedded into our agency who are dedicated staff trained on accessibility. We celebrate diversity and strive for a staff complement that is reflective of our customer base. Our State Rehabilitation Council for the Blind (SRC-B) shares our commitment to diversity and has dedicated a committee to Diversity, Equity and Inclusion. DEED policies strictly prohibit any form of harassment or discrimination based on the following protected classes:

- Race
- Color
- Creed
- Religion
- National origin
- Sex* (includes pregnancy, childbirth, and related medical conditions)
- Marital Status
- Familial Status
- Receipt of public assistance
- Membership or activity in a local human rights commission
- Disability
- Age
- Sexual orientation
- Gender identity
- Gender expression
- For employees, genetic information

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

- A lack of service providers is a significant barrier for assisting our customers and achieving successful outcomes. This is especially true for providers of:
 - ELL and Braille
 - Job Coaching
 - Orientation and Mobility Instruction
 - DeafBlind Services

- Services in Greater Minnesota
- Racial and Cultural Disparities- Our data shows that there are more unsuccessful outcomes for individuals who are part of the BIPOC community, specifically new Americans and English Language Learners. Our customer satisfaction level is higher for individuals from BIPOC communities, showing that they are satisfied with the services they are getting, yet they are still not achieving employment outcomes.
- Students who have multiple challenges may have many barriers since their primary disability may not be vision loss. SSB specializes in blindness rather than other disabilities. Therefore, we need to seek partners who can augment the programs with support for those students.
- SSB uses Title I funds to provide SE services and is declining to receive FFY2024 Supported Employment (SE) funds. SSB has chosen to decline SE dollars because the requirements for using these funds are too restrictive. These funds have youth matching requirements, and the funds can only be used once the individual enters employment. Youth with significant disabilities often require more in-depth and comprehensive training before they are ready and able to enter into employment. Often, they are over the age of 25 by the time this occurs. Should there be flexibility on when the funds can be used and a change to the supported youth matching requirements, SSB will revisit this decision.

3. Based on the barriers SSB has identified, there are many steps we are taking to address barriers:

- Continue working with DEED Human Resources Department to improve the hiring process by removing barriers and increasing equitable access such as removing driver's license requirements.
- Seeking to have a staff complement that reflects our customer base. SSB has a high percentage of staff who are blind, visually impaired, or DeafBlind and over the last few years, we have had an increased LGBTQ+ and BIPOC presence.
- Continue to champion and educate other state departments on the C700 program with the goal of increasing the number of Minnesotans with disabilities who are employed by the State.
- Hire an ELL Instructor/Coordinator to help with basic English language skills for ELL customers.
- Develop and nurture old and new partnerships with entities that represent underserved groups, including;
 - organizations that serve veterans,
 - communities of color,
 - English language learners
 - Tribal communities,
 - individuals with severe and persistent mental illness,
 - justice involved,
 - individuals with complex and significant disabilities, and
 - immigrants and refugees, especially East African
- Audio and written translations of agency materials by native speakers who are members of the minority and immigrant communities.
- Work with Community Partners to ensure they are armed with the resources they need to serve these communities.
- Build up community liaisons that can help connect SSB with underserved Minnesotans.

- Hired a second outreach coordinator to increase capacity and successful outcomes with messaging, outreach, and communication activities.
- Continue working with DeafBlind ATB training centers by developing new contracts and expanding existing services to increase national DB training options and bring more DeafBlind training options to Minnesota.

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Throughout calendar year 2024, we will be addressing the ELL component as well as outreach to underserved communities. A second outreach coordinator has been hired, so we have more capacity for these outreach activities.
- Planning for audio and written translations of SSB materials will start in January 2024, with work anticipated to start in spring and completion by the end of summer.
- We are in the beginning stages of hiring an ELL Instructor/Coordinator. The position request has been sent to DEED HR and could take 2 – 3 months for review. The hiring process to post the position description, review submissions, make an offer, and complete onboarding and training is anticipated to take 6 – 8 months.
- Developing a new contract with a DeafBlind ATB Training Center located outside of Minnesota could potentially take up to 4 months but is dependent on several factors. The evaluation of a correctly submitted application and proposal takes 2 – 3 weeks. However, the negotiation and contract development phase take more time.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

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.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - 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.

Title I

WIOA ADULT AND DISLOCATED WORKER

~~NEGOTIATED LEVEL OF PERFORMANCE FOR PROGRAM YEARS 22/23 & 24/25~~

~~WIOA ADULT Negotiated Measurement with DOL~~

	PY24/PY25	PY22/PY23	PY 26/27 Estimated Average
2nd Quarter Employment	75.6%/75.6%	71%/71%	73.3%
4th Quarter Employment	73.5%/73.5%	67%/69%	70.7%
Median Earnings	\$8,986/\$8,986	\$7,500/\$7,600	\$8,268
Credential Attainment	74%/74%	72%/73%	73.2%
Measurable Skill Gains	72%/72%	59%/59%	65.5%

~~DISLOCATED WORKER Negotiated Measurement with DOL~~

DISLOCATED WORKER Negotiated Measurement with DOL	PY24/PY25	PY22/PY23	PY 26/27 Estimated Average
2 nd Quarter Employment	81%/81%	80%/80%	80.5%
4 th Quarter Employment	80%/80%	79%/79%	79.5%
Median Earnings	\$12,309/\$12,309	\$12,300/\$12,300	\$12,304
Credential Attainment	79.7/79.7%	78%/78%	78.8%
Measurable Skill Gains	75.8%/75.8%	65%/66%	70.6%

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State Plan Table includes PY26-27 Estimated levels.

WIOA Adult Performance Indicators	PY 2026 Estimated Level	PY 2026 Negotiated Level	PY 2027 Estimated Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	~~723.43%~~		~~723.43%~~	
Employment (Fourth Quarter After Exit)	~~69.370.7%~~		~~6970.37%~~	
Median Earnings (Second Quarter After Exit)	~~\$8,268955~~		~~\$8,268955~~	
Credential Attainment Rate	~~713.2%~~		~~713.2%~~	
Measurable Skill Gains	~~665.55%~~		~~665.5%~~	
Effectiveness in Serving Employers	Not Applicable*	Not Applicable*	Not Applicable*	Not Applicable*

WIOA Dislocated Worker Performance Indicators	PY 2026 Estimated Level	PY 2026 Negotiated Level	PY 2027 Estimated Level	PY 2027 Negotiated Level

Employment (Second Quarter After Exit)	~~7780.5%~~		~~7780.5%~~	
Employment (Fourth Quarter After Exit)	~~769.5%~~		~~769.5%~~	
Median Earnings (Second Quarter After Exit)	~~\$12,678304~~		~~\$12,678304~~	
Credential Attainment Rate	~~768.78%~~		~~768.78%~~	
Measurable Skill Gains	~~710.96%~~		~~710.96%~~	
Effectiveness in Serving Employers	Not Applicable*	Not Applicable *	Not Applicable *	Not Applicable *

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

Title II Adult Education

<u>Performance Indicators</u>	<u>PY 2026 Expected Level</u>	<u>PY 2026 Negotiated Level</u>	<u>PY 2027 Expected Level</u>	<u>PY 2027 Negotiated Level</u>
<u>Employment (Second Quarter After Exit)</u>	<u>32.0%</u>		<u>32.1%</u>	
<u>Employment (Fourth Quarter After Exit)</u>	<u>32.75%</u>		<u>32.85%</u>	
<u>Median Earnings (Second Quarter After Exit)</u>	<u>\$8,750</u>		<u>\$8,760</u>	
<u>Credential Attainment Rate</u>	<u>35.3%</u>		<u>35.4%</u>	
<u>Measurable Skill Gains</u>	<u>37.0%</u>		<u>38.0%</u>	
<u>Effectiveness in Serving Employers</u>	<u>Not Applicable 1</u>	<u>Not Applicable 1</u>	<u>Not Applicable 1</u>	<u>Not Applicable 1</u>
<u>Performance Indicators</u>	<u>PY 2024 Expected Level</u>	<u>PY 2024 Negotiated Level</u>	<u>PY 2025 Expected Level</u>	<u>PY 2025 Negotiated Level</u>
<u>Employment (Second Quarter After Exit)</u>	<u>35.0%</u>	<u>36.8%</u>	<u>35.3%</u>	<u>37.0%</u>
<u>Employment (Fourth Quarter After Exit)</u>	<u>36.0%</u>	<u>39.1%</u>	<u>36.3%</u>	<u>39.2%</u>
<u>Median Earnings (Second Quarter After Exit)</u>	<u>6,200.0</u>	<u>\$7,602</u>	<u>6,250.0</u>	<u>\$7,603</u>
<u>Credential Attainment Rate</u>	<u>20.0%</u>	<u>20.0%</u>	<u>20.3%</u>	<u>20.3%</u>
<u>Measurable Skill Gains</u>	<u>29.0%</u>	<u>36.7%</u>	<u>29.5%</u>	<u>36.8%</u>
<u>Effectiveness in Serving Employers</u>	<u>Not Applicable¹</u>	<u>Not Applicable¹</u>	<u>Not Applicable¹</u>	<u>Not Applicable¹</u>

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADDITIONAL INDICATORS OF PERFORMANCE

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.

OTHER APPENDICES

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

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

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The State Plan must include	Include
services funded directly, in whole or in part, by the Department of Labor.	

CAREER AND TECHNICAL EDUCATION PROGRAMS AUTHORIZED UNDER THE 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) (TITLE 20, UNITED STATES CODE (20 U.S.C. 2301 ET SEQ.))

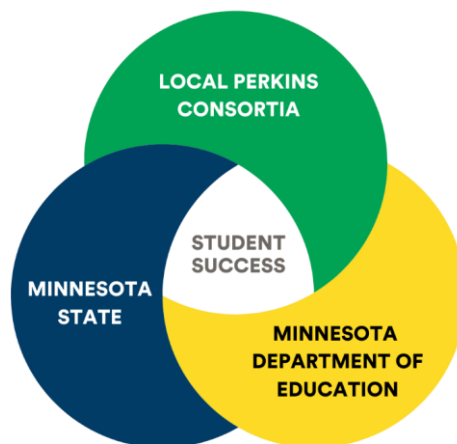
NOTE: Unless otherwise noted, statutory references in this section are to Pub. L. 115-224,— *The Strengthening Career and Technical Education for the 21st Century Act* (“Perkins V” or “the Act”). (20 U.S.C. 2301 et seq.) The term “the State” used throughout this section refers to the State Perkins Eligible Agency and “the State Plan” refers to the “Perkins State Plan”.

(OMB Control Number: 1830-0029)

A. PLAN DEVELOPMENT AND CONSULTATION

PLAN DEVELOPMENT AND CONSULTATION

- 1) DESCRIBE HOW THE STATE PLAN WAS DEVELOPED IN CONSULTATION WITH THE STAKEHOLDERS AND IN ACCORDANCE WITH THE PROCEDURES IN SECTION 122(C)(2) OF PERKINS V. SEE TEXT BOX 1 FOR THE STATUTORY REQUIREMENTS FOR STATE PLAN CONSULTATION UNDER SECTION 122(C)(1) OF PERKINS V.



As the eligible agency for the administration of Career and Technical Education in the state, Minnesota State Colleges and Universities, or Minnesota State, works closely in partnership with the Minnesota Department of Education's Career and College Success Division and local consortia to administer Perkins V throughout the state. Local consortia consist of participating school districts and two-year state colleges located within 23 distinct geographic areas encompassing the entire state. Through a collaborative partnership, together we ensure the successful development and implementation of the state plan. Because of this partnership of three, career and technical education initiatives have historically been proactive in aligning activities between secondary and postsecondary CTE programs, and promoting student success and seamless transitions from secondary to postsecondary educational opportunities. As an example of this alignment, Minnesota has a program of study rubric that promotes concurrent enrollment, articulation agreements, and demonstrated authentic work experiences between school districts and community colleges/technical colleges and community employers. Additionally, extensive professional development will continue to support secondary and postsecondary partnerships for the development and continuous improvement of programs and Programs of Study, the recruitment and retention of educational professionals, and equity of access and services for every student.

One of the biggest challenges for Minnesota in the development of the Four-Year Perkins V plan is providing the right timing and balance between the needs and requirements of the state and the needs of local consortia. To achieve that balance, Minnesota's Perkins V plan development and consultation is the result of a combination of state and local efforts. The primary components of the plan development consisted of an extensive collaboration among the state staff, secondary and postsecondary, business and industry, and community partners. Structurally, the work began with a facilitated broad-based planning group to set the vision, mission, principles, and identify five strategic work groups: Advancing CTE, Career-connected Learning, Integrated Network, Equity and Inclusion, and Knowledgeable Experts. The plan development and the strategic workgroups involved state executive leadership work, consultation with our consortia leaders, public meetings, and incorporation of local input.

While consultations occurred at the state level with interested community representatives, advisory groups, superintendents, postsecondary academic administrators, teachers and faculty, the governor's office through the educational liaison, the Tribal Nation Education Council, and business groups, both engagement and consultation also occurred at the regional and local level through completion of the comprehensive local needs assessment work by all 23 Perkins consortia. Frameworks, critical questions, continuous improvement rubrics, equity plans--required components of the Perkins V plan--were developed at the state level with consultation and customization at the local level to address local students, community, and workforce needs. To facilitate the consultation process, Minnesota began its Perkins V work with the development of the comprehensive local needs assessment.

The Advancing CTE strategic work group was charged with developing a framework for the comprehensive local needs assessment (CLNA) and was also responsible for accountability, outreach, and promoting the CTE story through awareness and communication. The Career Connected Learning group reviewed and revised the state's career pathways projects with a priority on the development of shared standards and definitions of program quality and the

integration of work-based learning (WBL). The career preparation aspects of career-connected learning also fell into the work of this group. The integrated network group was intended to provide more intentionality in our relationships with the multiple federal, state, and local networks necessary for successful CTE work. Equity and Inclusion, an integral part of the work of all the strategic work groups, focused on service partnerships, providing resources, and data management. The Knowledgeable Experts group oversees the critical professional development and technical assistance role of Perkins V. Teacher licensure preparation programs and minimum qualifications, the mentor/mentee project, consortia leadership, and responding to local requests are the tasks of this group.

Much research, input, and development went into the creation of Minnesota's *Comprehensive Local Needs Assessment (CLNA) Guide* and *Framework* for the original state plan. The needs assessment is viewed as one of the most significant levers for change introduced with Perkins V. The CLNA changes the dynamics and habits of Perkins IV with the requirement to base budget development on its outcomes. Aligning business priorities has always been an essential component of Perkins work with an increasing need to make that connection through the comprehensive local needs assessment. The CLNA and Application processes were reviewed as part of updating the four-year state plan. Based on feedback from consortium leaders and state staff, the CLNA Framework document was revised to be the *CLNA Results and Priorities* template, providing a clearer structure for consortia to report on the results of the CLNA and identify the key needs. The new *CLNA Results & Priorities* template was submitted to OCTAE with the 2024 State Plan Update.

Beginning in October of 2018, day-long workshops, webinars, face-to-face meetings, and virtual mentoring, along with professional development prepared local consortium leaders and work groups for the relevancy of, and work required, to complete the CLNA. The CLNA Guide provides Minnesota Perkins consortium leaders with context on how to conduct the CLNA and translates language of the law into concrete, actionable steps for conducting a rigorous needs assessment that meets the *Strengthening Career and Technical Education for the 21st Century Act* requirements. When the CLNA is complete, a consortium will have findings that provide an accurate picture of local CTE programs and learners. It creates an incredible opportunity to:

- assist students toward achieving career success,
- align Perkins budgets with priorities and ensure that programs are aligned with and validated by local/regional workforce needs and economic priorities,
- ensure that consortium programs are serving all learners equitably and to focus resources on programs that lead to high-skill, high-wage, or in-demand occupations while addressing disparities or gaps in performance,
- build on other process improvement efforts such as ESSA, WIOA, World's Best Workforce etc., and
- provide a structured way to engage programmatic partners regularly around the quality and impact of consortium CTE programs and systems.

Ultimately, the local needs assessment process is about helping applicants make a formal shift from merely collecting and reporting information to using information strategically to drive

decisions about consortium CTE programs that lead to success for students, employers, and the community.

To mentor consortia in the implementation of the CLNA, Minnesota uses a six-step process: prepare, explore, assess, prioritize, communicate, and evaluate. The Perkins state executive team focuses on the continuous improvement of processes so that local consortia can complete their work efficiently and effectively. The gathering of the local programmatic partnership groups and the prioritization of regional work comes from these efforts. From the CLNA data gathering and analysis, consortia formulate actions to address gaps and enhance successes. Resources needed to implement those actions are the basis for the development of the local budget request.

The information obtained from both the CLNA and the full set of consortium applications includes the reflection of local consultations. This information is reviewed by the state leadership team. Final strategies and actions for the work of the state are guided by feedback from that submission. The information also informs state leadership regarding professional development and technical assistance needs.

- 2) CONSISTENT WITH SECTION 122(E)(1) OF PERKINS V, EACH ELIGIBLE AGENCY MUST DEVELOP THE PORTION OF THE STATE PLAN RELATING TO THE AMOUNT AND USES OF ANY FUNDS PROPOSED TO BE RESERVED FOR ADULT CAREER AND TECHNICAL EDUCATION, POSTSECONDARY CAREER AND TECHNICAL EDUCATION, AND SECONDARY CAREER AND TECHNICAL EDUCATION AFTER CONSULTATION WITH THE STATE AGENCIES IDENTIFIED IN SECTION 122(E)(1)(A)-(C) OF THE ACT. IF A STATE AGENCY, OTHER THAN THE ELIGIBLE AGENCY, FINDS A PORTION OF THE FINAL STATE PLAN OBJECTIONABLE, THE ELIGIBLE AGENCY MUST PROVIDE A COPY OF SUCH OBJECTIONS AND A DESCRIPTION OF ITS RESPONSE IN THE FINAL PLAN SUBMITTED TO THE SECRETARY. (SECTION 122(E)(2) OF PERKINS V)

Minnesota has structured its implementation of federal Perkins funding through a three-pronged model: Minnesota State, Minnesota Department of Education, and the local consortia. This model of governance and distribution of funds has provided a tradition of alignment of secondary and postsecondary partners that will continue with the *Strengthening Career and Technical Education for the 21st Century Act* (Perkins V).

Minnesota State, the eligible agency, continues to oversee the administration and implementation of the state's Perkins grant with our Minnesota Department of Education partners. The Perkins V Four-Year State Plan will continue to advance Minnesota's vision for Career Technical Education (CTE) by maintaining the 50:50 fiscal split between secondary and postsecondary, the fifteen percent level for reserve funding, and the utilization of data-driven decisions through the CLNA process.

The major responsibility for postsecondary career and technical education resides with the Minnesota State Academic and Student Affairs (ASA) units; specifically, research, educational innovations, and academic affairs. These ASA units support CTE work for such initiatives as early college opportunities, program approvals and transfer, data research and reporting, accessibility services, and faculty credentialing, --all essential for the success of our learners. The CTE unit also works closely with the Equity and Inclusion division of Minnesota State, especially in the execution of the federal OCR requirements and overall professional development committed to support, protect, and encourage inclusive opportunities through the system.

As a separate but partnered agency, the Minnesota Department of Education, Career and College Success Division, Office of Career and Technical Education provides oversight for secondary education. The CTE unit advances educational initiatives in collaboration with other secondary agency Divisions including Indian Education, School Support, Academic Standards and Instructional Effectiveness, Research and Assessment, Equity and Achievement, Early Learning and State Library Services. Initiatives included:

- Farm-to-Table Culinary Curriculum
- CTE Safety Protocol development and communication
- Collaboration with PELSB to implement the Tiered Licensing System
- CTE Levy technical support for school districts
- CTE curriculum framework development for all CTE program areas
- Professional development on continuous improvement
- Integration of quality program assessment measures in school district Program Approval processes
- Data research reporting and analysis support for local school districts

The CTE Unit also participates as part of the Minnesota Department of Education Academic Success Team comprised of curriculum and instruction, school support, assessment, and other agency divisions.

The Perkins allocation for the state of Minnesota was approximately \$21.3 million in FY24. Minnesota State is the fiscal agent for the grant and, as such, utilizes 5% of the allocation for Administration. Using Perkins V funding levers to help drive meaningful change, Minnesota's Perkins V plan demonstrates that the consortium model empowers equal partnerships to make joint decisions to collaboratively plan and implement CTE programs and services. The initial Perkins V state plan reflected changes in the funding distribution model as shown below; this updated plan will continue with the same distribution percentages.

- 1) Distribution of the 85% of the state allocation provided to the local consortium applicants:

Basic Revenue: 85% (of the 85%) will be distributed utilizing the current formula process

Reserve Revenue: 15% (of the 85%) will be distributed between rural and high numbers of CTE concentrators

Secondary/postsecondary split: 50:50 in all calculations, basic and reserve

- 2) **State Leadership:** the secondary/postsecondary split of state leadership funds will be distributed as 42% secondary and 58% postsecondary.

State Institutions and Nontraditional will continue to be part of the leadership funds allocated to postsecondary. Minnesota State also will continue to fund major state-wide work such as the annual conferences, and communication and software supporting the local applications with that higher percentage of leadership funds.

Planning teams and Perkins state leadership researched and considered utilizing the RFP process to distribute the 15% reserve funding competitively to provide potentially larger investments to consortia selected to receive this funding. Feedback received on this was not supportive of the change prior to the submission of the first Perkins V state plan. Minnesota also considered alternative ways to distribute reserve funding with the revised four-year state plan, but data showed that percentage changes would negatively impact rural consortia. As a result, state leadership decided to continue the formula distribution model at this time.

- 3) DESCRIBE OPPORTUNITIES FOR THE PUBLIC TO COMMENT IN PERSON AND IN WRITING ON THE STATE PLAN. (SECTION 122(D)(14) OF PERKINS V)

Minnesota State and MDE state staff held an in-person meeting with Minnesota Consortium Leaders at the Annual Perkins Leaders Fall Meeting on October 30, 2023, to provide an overview of the 2024 State Plan draft and to collect input on the use of Reserve Funds and proposed changes to the CLNA reporting form and the Local Application template. State staff facilitated discussion and provided "Your Input Matters" forms to collect feedback. In addition, a webinar with Perkins Leaders was held on December 14, 2023, to provide updates on the use of Reserve Funds and the revised template forms based on the feedback. The public comment process and the state plan submittal timeline, including the WIOA submittal requirements were also reviewed.

Minnesota sought public comment on the proposed 2024 State Plan and the State Determined Performance Levels (SDPLs) for all six secondary and all three postsecondary core performance indicators. The *Minnesota Perkins V Public Comment Engagement Plan* was followed to notify and seek feedback from a broad representation of the public, including, but not limited to, secondary and postsecondary educators and staff, students, parents, community members, and industry partners. The [Public Comment Notice](#) webpage provided the purpose, guiding principles, documents, timeline, and form for submitting feedback. For those who did not wish to use the online form, an email address was provided where comments could be submitted (PublicComments@minnstate.edu). Comments were accepted December 8, 2023 through 11:59 pm January 7, 2024. All public comments received were collected via an online form. Public comments with responses on the State-Determined Performance Levels (SDPLs) are presented under section D, Accountability for Results, #4. All state plan public comments with responses from Minnesota State and MDE are provided in the Appendix. No comments were submitted to the email inbox.

The public notice to comment was sent to multiple groups, asking them for their input on the state plan and proposed core indicator state-determined performance levels. The primary method for distributing the public comment notice was through email and LISTSERVS, which tended to be the most reliable method to reach the groups. Recipients of these emails were asked to forward and share the public comment notice with their contacts to reach the widest audience possible. The public comment page linked in the email provided readers with instructions on how to submit their comments, supporting documents, a purpose statement, and a call to action.

The table below provides details regarding the dates the communications were sent, the targeted audience, and the method/vehicle for distribution. There were also instances of informal sharing of the public comment opportunity by MDE and Minnesota State staff at various in-person or webinar meetings that occurred prior to and during the month in which public comments were being accepted.

Date Communication Sent	Target Audience	Method/Vehicle for Distribution
Dec. 8	Minnesota State Academic and Student Affairs college and university	ASA Newsletter (online)
Dec. 8	Perkins consortium Leaders and coordinators LISTSERV Note: Emails sent 12/8/2023, 12/28/2023	Email
Dec. 8	MDE CTE Staff via Perkins Leaders LISTSERV Note: Emails sent 12/8/2023, 12/28/2023	Email
Dec. 8	Minnesota State INSTRESEARCH listserv Note: Emails sent 12/8/2023 and	Email

	1/3/2024	
Dec. 8	MDE Data and Leadership	Email
Dec. 8	Minnesota State Board of Trustees	Email
Dec. 8	College and University Presidents	Email
Dec. 8	Academic and Student Affairs Groups • Senior Academic Affairs Officers • Senior Student Affairs Officers • College/University Deans • College/University Faculty • Academic Advisors • Accessibility Coordinators • Counselors • PSEO Coordinators • Veterans Coordinators	Minnesota State List Serv system
Dec. 8	MinnState Academic Support: Tutoring Professionals Multicultural Services Professionals	Email
Dec. 8	MinnState Workforce and Economic Development Division	Email
Dec. 8	Minnesota Centers of Excellence directors and communications staff (to reach business and industry associations and partners)	COE Communicators List Serv Center Directors
Dec. 8	College and University marketing and communications staff	Key Communicator List Serv
Dec. 8 -15	MDE Specialists • Secondary Teacher List • Superintendent List • Principal List • Indigenous and Indian Tribes and Tribal Organizations • AFNR Lists and MAELC Board • MNHOSA List • FCCLA/FCS List • Work-Based Learning List • Business List • Trades and Industry List	Email
Dec. 8	MDE Communications Staff	Email
Dec. 8	MDE Commissioner & Executive Leadership	Email
Dec. 8	Adult Basic Education	Email

Dec. 8	MN Governor's Office	Email
Dec. 8	MN Department of Labor	Email
Dec. 8	RealTime Talent and Chamber (business, industry, small business and workforce)	Email
Dec. 8	MnACTE and MACTA Professional Associations	Email
Dec. 8-11	Indian Tribes & Tribal organizations/tribally controlled colleges or universities	Email
Dec. 8	Juvenile Justice Facilities, Correctional Institutions	Email
Dec. 8-11	Community organizations such as Greater United Way, Goodwill-Easter, etc.	Email
Dec. 8	Other community organizations connected with and serving special populations (e.g., students with disabilities, single parents, English Language Learners, etc.	Email
Dec. 8	Special Populations – members and representatives	Email
Dec. 8	MinnState System Office Equity and Inclusion Office and diversity officers	Email
Dec. 8	Secondary Students: MNFSO and CTSO (student groups) SkillUSA MN BPA DECA FCCLA HOSA	Email
Dec. 8	Postsecondary Students MinnState Student Leadership Organizations: LeadMN (2-year college) Students United (2-year universities)	Email
Dec. 8	Business and Industry Partners: Minnesota Precision Manufacturing Assoc. Minnesota Hospital Association Minnesota Technology Association Minnesota Construction Association Hospitality Minnesota	Email

The public comment online form asked responders to indicate what group(s) they identified with (teacher, faculty, specialized instructional support personnel, paraprofessional, school

leader, authorized public chartering agencies/charter school leaders, employers, labor organizations, parents, students, Indian tribes and Tribal Organizations, community organization or other). The online form included space for the public to provide feedback on Minnesota's career and technical education priorities and activities outlined in the state plan and respond to three primary questions related to the SDPLs:

- Do the proposed state performance levels meet the requirements of the law?
- Do the proposed state performance levels support the improvement of all CTE concentrators, including subgroups of students as specified in Section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965 and special populations, as described in Section 3(48)?
- Do the proposed state performance levels support the needs of the local education and business community?

Individuals providing comments were also asked to specify the indicator they were commenting on (if comments were specific to one indicator) by noting the core indicator number in their comments.

All state plan public comments with responses from Minnesota State and MDE are provided in the Appendix. All written responses to the public comments regarding the SDPLs are provided in section D.4.

[Note to reader: The following information documents the public comment process for the original Perkins V four-year state plan established in 2020.]

Opportunities for public comment in person and in writing were provided through face-to-face meetings and webpages with questions, state documents, and provisions to allow individuals to provide written comments. Multiple public meetings were held at various times and locations to provide a wide range of opportunities for individuals to attend. A neutral contractor was hired to facilitate the public hearings to avoid any perception of control of the discussion by state leadership. Comments were collected and routed to the state leadership team for action. Direct comments were provided to state leadership through email correspondence. These were sent to the facilitator for inclusion in the feedback report.

Notifications of public hearings and the webpage address for input, including the performance indicators, were provided electronically to the following:

- Adult Basic Education
- Association of School District Homeless Liaisons
- Business and Industry Groups:
 - Minnesota Precision Manufacturing Association
 - Minnesota Hospital Organization
 - Minnesota Construction
 - Hospitality Minnesota
 - Minnesota Technology Association
 - Minnesota Bankers Association

- FCCLA
- General Public through Facebook, Twitter
- Minnesota Business Professionals of America (BPA) Board
- Minnesota Centers of Excellence: distribution to industry partners through the Centers
- Minnesota Chambers of Commerce
- Minnesota DECA Board
- Minnesota Governor's Office
- Minnesota State Academic and Student Affairs personnel including:
 - administrators
 - faculty development
 - academic advisors
 - accessibility coordinators
 - PSEO and concurrent enrollment directors
 - veterans
 - students
- Minnesota State Board of Trustees
- Minnesota superintendents
- Perkins consortium leaders and coordinators
- Professional associations: MnACTE, MACTA
- Secondary teacher list by MDE specialists
- SkillsUSA MN Board
- Special education directors
- Student organization advisors
- Variety of community organizations and foundations
- WIOA partners:
 - Department of Labor
 - Department of Employment and Economic Development
 - Department of Human Services
 - Department of Corrections
 - Adult Basic Education

In addition, the front banner of the Minnesota State webpage highlighted the public hearing and provided a space for general and specific comments. The text provided is the following:

Minnesota State and Minnesota Department of Education invite you and the members of the community to attend and participate in public hearings to discuss the changes to the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). The focus of Perkins V is the alignment of systems and program improvement (Section 122(a)(3) State Plan requirement of The Act).

We are seeking your input on:

- proposed state determined performance levels,
- the alignment of programs of study to industry needs,
- financial distribution of funds,
- increasing student access to high-quality education, and
- supporting the full continuum of offerings from career exploration through preparations to meet the changing needs of learners and employers.

Public Comment and Hearing Update

Thank you for participating in these public hearing sessions. We are still accepting general comments and feedback on performance levels through Nov. 30, 2019.

[Submit general comments](#)

[Submit comments on performance levels](#)

During the public meetings, Minnesota State Staff provided an overview of the Perkins V plan and a neutral facilitator solicited feedback through a series of questions. Responses to the questions and an overview of discussion points have been collected in report form.

In addition to the series of public comment meetings, state staff met with Minnesota Tribal Nations Education Committee (TNEC) whose mission is to “strengthen, protect, and advance the overall education experiences and opportunities for all Tribal (American Indian) students, families, and communities of Minnesota.” The notes of that discussion are included in the comment report attached. At the recommendation of that group, Tribal Nation contacts were cross-walked to current Perkins consortia so that Perkins leaders, in their CLNA work, would be inclusive of the Tribal Nation leadership.

Feedback on accountability factors occurred in a parallel but separate process, coming together in the public hearings and the posting of the full 4-year plan.

Secondary

Secondary and postsecondary accountability involves a collaboration between two agencies, each with its own data systems and internal processes. Therefore, transition planning for secondary accountability required a dual decision-making process. The process for identifying and defining secondary performance indicators occurred in two phases.

Phase one included an extensive information gathering process as well as documenting feedback from internal state staff. The purpose was to thoughtfully compile information and identify meaningful and specific questions to gather input during phase two. State CTE specialists attended five two-hour-long, in-person meetings in which they reviewed data files, policy documents, and ESSA requirements in addition to considering existing data collection systems and other available data sources. Staff considered all information and materials they reviewed through the lens of our state’s recently updated mission and vision for Career and Technical Education as well as the following questions.

Does this data and information:

- 1) advance our statewide goals for CTE?
- 2) support all of our CTE students and approved programs?
- 3) support the needs of our Business and Industry partners as well as local communities?
- 4) align with the Perkins V legislation?
- 5) align with other existing state legislation?

Products from the phase one internal secondary CTE state staff meetings included a refined list of key decision-points, discussion questions to pose to the advisory group, and a list of materials and resources to broaden engagement.

Phase 2 involved sharing the previously identified information with secondary representatives to collect and compile their recommendations. The “Perkins V Secondary Accountability

Technical Advising Committee” included secondary consortium leaders; postsecondary partners; local CTE policy and advocacy groups; school counselors; work-based learning (WBL) coordinators; high school teachers; principals; superintendents from rural, suburban, and large metro districts; business and industry leaders from each sector of the CTE Career Wheel; Workforce Center staff; and Tribal leaders. During spring 2019, approximately thirty advisory group members engaged in three four-hour in-person meetings. All resources and materials were made available within a secure site so participants could access the information at any point. During the facilitated in-person meetings, advisory group members discussed data sources, reviewed simulated historical data, and considered policy and legislative documents in small groups.

Advisory group members were asked to consider all information through the lens of the questions listed above as well as the following questions: Are all performance indicator definitions/measures valid, reliable, meaningful, and possess a high degree of integrity and transparency? Are they equitable across all student groups? Following each meeting, members were encouraged to discuss options and implications with their constituents and gather additional feedback that would ultimately inform their recommendations to the state.

Recommendations for specific performance indicator definitions were collected using an online survey tool; recommendations for the CTE Concentrator definition and program quality measures were collected using paper and pencil to document full thoughts and ideas. There were clear recommendations to the state regarding performance indicator definitions, updated CTE Concentrator definition, and the program quality indicator that was preferred.

Following the rollout of the full scope of the Perkins accountability system and performance-level methodology, recommendations made by the original workgroup came under review. Group members, district leaders, local partners, and state leadership staff probed the implications of each potential program quality indicator. Further discussion and questions, data, and state-level priorities were analyzed. These discussions resulted in MDE leadership carefully reviewing initial recommendations and making changes to the indicators. Original members of the technical advisory group as well as all secondary consortium leaders were invited to

provide feedback on whether the state should move forward with the previously recommended optional “Other” indicator or if other solutions should be considered at the state level. Additional comments and feedback were gathered regarding the optional program quality performance indicator via a survey tool. Results of that survey prompted MDE leadership to make changes based on the deeper research. The new indicators were posted, and the comment period was extended to meet the 60-day requirements.

Postsecondary

In developing postsecondary operational definitions and identifying data sources for participants, concentrators, and each indicator, the state created an accountability workgroup consisting of state research staff for secondary and postsecondary, the State Director of Career Technical Education, and the Interim Associate System Director of Career Technical Education. The workgroup met as needed, generally at least once a month, to provide updates regarding ongoing work, brainstorm solutions to issues that arose, and clarify any questions about process and timelines. Members of the workgroup then consulted with regional partners and determined our operational definitions and data sources were substantively similar. Consortium coordinators were given the opportunity to review and comment on legislative definitions and proposed operational definitions at the Minnesota Association of Career and Technical Administrators (MACTA) meeting in April (2019). Throughout May and June, as work on revising operational definitions, identifying data sources, and developing datasets progressed, key consortium coordinators and institutional research staff were engaged in phone calls and online meetings to provide feedback. In July, at a meeting of all consortium coordinators, the final draft of definitions and data sources used to develop the accountability datasets was presented and discussed. Finally, consortium coordinators and institutional research staff were presented with the final details regarding the accountability indicators in September.

State Determined Performance Levels (Secondary and Postsecondary)

In developing state-determined performance levels, in addition to the regular workgroup meetings, we consulted with regional partners in June and August and determined our methodology for establishing performance levels is relatively similar. We also consulted with Minnesota Department of Employment and Economic Development (DEED) throughout June specifically to better understand the statistical adjustment model used for the WIOA Performance Accountability System and discuss how it might apply to Perkins accountability indicators. An online meeting was held in September with consortium coordinators and institutional research staff where questions and feedback were discussed. In October, the state-determined performance levels were presented at regional public hearings and published on the Minnesota State website with a form that allows the public to submit comments. The state-determined performance levels with revisions from the public comment were presented at a meeting with all consortium coordinators in November.

Sensitive to the lack of public input, Minnesota also leveraged existing meetings and communications to solicit unstructured input, such as:

- CTE consortia leadership meeting
- Governor's Workforce Development Board meeting
- Local program advisory committee meetings
- State CTE staff planning meetings
- Manufacturing cluster meetings
- Minnesota State Centers of Excellence meetings
- Minnesota State Academic and Students Affairs webinars, conferences, unit meetings
- One-on-one outreach
- Regional and local comprehensive local needs group meetings
- Regional superintendent meetings
- State CTE staff planning meetings,
- WIOA State Plan partnership meetings

Though multiple dates, times, and methodologies for input were presented, the State received few comments or suggestions. A neutral third party provided a summary overview of the consultation work collected. Three separate documents were available for review on the Minnesota State webpage: Minnesota Perkins V, Executive Summary, Public Comment Report; Minnesota Perkins V Secondary & Post-Secondary Indicator Report Summary; and Complete Discussion Notes. The conversation with the Tribal Nation Education Council did not follow the questions used in the public hearing but rather became a more general conversation about better communication and alignment with career and technical education initiatives.

PROGRAM ADMINISTRATION AND IMPLEMENTATION

1) STATE'S VISION FOR EDUCATION AND WORKFORCE DEVELOPMENT

- A. PROVIDE A SUMMARY OF STATE-SUPPORTED WORKFORCE DEVELOPMENT ACTIVITIES (INCLUDING EDUCATION AND TRAINING) IN THE STATE, INCLUDING THE DEGREE TO WHICH THE STATE'S CAREER AND TECHNICAL EDUCATION PROGRAMS AND PROGRAMS OF STUDY ARE ALIGNED WITH AND ADDRESS THE EDUCATION AND SKILL NEEDS OF THE EMPLOYERS IN THE STATE IDENTIFIED BY THE STATE WORKFORCE DEVELOPMENT BOARD. (SECTION 122(D)(1) OF PERKINS V)

The State of Minnesota continues to support workforce development activities through the collaborative work led by the Governor's Workforce Development Board (GWDB), the Minnesota Association of Workforce Boards (MAWB) and the Minnesota Department of Employment and Economic Development (DEED) through the unified public workforce system under the name CareerForce. In addition, specific grants through the Minnesota Department of Labor and Industry (DLI) and the Office of Higher Education (OHE) support career pathways, teacher recruitment, and students directly. Both Minnesota State and the Minnesota Department of Education are also partners in this work.

Key workforce development activities include:

CareerForce

In a collaborative effort led by the GWDB, MAWB, and DEED, a unified public workforce system continues to unify Minnesota's workforce development services through the almost 50 CareerForce locations around the state and the online labor exchange, career services and resources. [CareerForceMN](#) features innovative career planning tools, workforce development resources, and customized labor market information for career seekers, businesses, and workforce staff and partners. The site supports the CareerForce mission to facilitate thriving career solutions for individuals, employers, communities, and Minnesota, promoting equitable access to prosperity for all. With a CareerForceMN account, users can set career goals; like, save, and share content; and initiate CareerForce Connections.

Governor's Workforce Development Board (GWDB)

GWDB continues to focus on addressing the workforce shortage with emphasis on interagency coordination and equitable system as reflected in the proposed 2024-2027 WIOA State Plan Goals:

- Increase interagency coordination and alignment around shared goals, maximizing efficiency and coordination of workforce funding and programs and improving system integration, and creating a "no wrong door" approach for individuals or employers engaging in the workforce system.
- Build employer-led industry-sector partnerships across the state to create or expand responsive and equitable workforce development programs and career pathways with embedded work-based learning (WBL) or on-the-job training, including Registered Apprenticeships, focused on closing gaps in participation and representation based on race, ethnicity, disability, gender, veteran status, and age.
- Create a more inclusive, equitable, accessible, and proactive workforce system to serve all Minnesotans, preparing employers and the current and emerging workforce for the changing nature of work including new and emerging technology, changing labor market demands, and for the state's shifting demographics, including our new Minnesotans.

Workforce Development Scholarships

The Minnesota Legislature continues to fund Workforce Development Scholarships for students enrolled in high-demand educational programs leading to employment in six industries – advanced manufacturing, agriculture, health care, information technology, early childhood education, and transportation. The scholarships are available to new students entering associate degree, diploma, or certificate programs at any of the 26 Minnesota State community and technical colleges or to students completing two terms and transferring to an eligible program at one of the seven Minnesota State Universities. The scholarships cover approximately half the cost of tuition and fees for the required credits. The State Higher Education Bill (HF 2073) passed during the 2023 legislative session continues funding for these scholarships and adds construction, education, and public safety to the list of eligible programs.

Data from the most recent reporting year (*Workforce Development Scholarship Report to Legislature – February 2023*):

- In the 2021 – 2022 academic year, 1,955 students (1,918 college students and 37 university students) received a Workforce Development Scholarship for an award total of \$3,921,997.
- In Fall 2022, 1,149 college students received a first-year award for a total of \$1,440,039 and 283 college students received a second-year award (\$352,750). Twenty-nine university students received a scholarship (\$36,250) for a total of 1,461 scholarship students in fall 2022.
- In the 2021 – 2022 academic year, students receiving Workforce Development Scholarships were enrolled in the following program areas:
 - Healthcare Services – 48 percent
 - Advanced Manufacturing – 13 percent
 - Transportation – 12 percent
 - Information Technology – 11 percent
 - Early Childhood – 6 percent
 - Agriculture – 4 percent
 - Other technical/liberal arts percent – 6 percent

Workforce Development Scholarship Recipients: Degrees Awarded by Industry and Fiscal Year*					
Industry	FY 19	FY 20	FY 21	FY 22	Total by Industry
Advanced Manufacturing	11	110	243	284	648
Agriculture	1	18	40	57	116
Construction	-	-	-	6	6
Early Childhood Education	-	5	26	79	110
Health Care Services	7	137	398	633	1,175
Information Technology	-	30	108	163	301
Law Enforcement	-	-	-	1	1
Transportation	-	15	138	192	345
Total	19	315	953	1,415	2,702

**Workforce Development Scholarship Report to Legislature – February 2020, 2021, 2022, and 2023*

DEED Training Grant Programs

The Minnesota Jobs Skills Partnership (MJSP) provides short-term training for long-term employment and offsets training-related expenses. Grants include the Partnership Program, which provides up to \$400,000 to educational institutions that partner with businesses to develop job training or retraining for existing employees, the Job Training Incentive Program which provides up to \$200,000 to new or expanding businesses, and the Pathways Program that provides grants of up to \$400,000 to educational institutions or nonprofit organizations that partner with businesses to provide training, new jobs, and career paths for low-income people.

Dual Training Grant

In support of the implementation of the [Minnesota Dual-Training Pipeline](#) administered by the MN Department of Labor and Industry (DLI), the 2015 Minnesota Legislature established the [Dual Training Grant](#) administered by the MN Office of Higher Education (OHE). The Dual Training Grant (Minnesota Statutes 136A.246) is a funding source that generates collaborative and strategic educational solutions between employers and related-instruction providers across Minnesota in the industries of advanced manufacturing, agriculture, healthcare services, and information technology. It pairs on-the-job training with related instruction to generate a comprehensive platform for learning. Employers, or organizations of employers, may apply for grants to reimburse expenses related to instruction toward attaining an industry-recognized degree, certificate, or credential for their employees.

Concurrent Enrollment

- The **Office of Higher Education** administers the [Concurrent Enrollment Grant Program](#) to develop new concurrent enrollment courses and expand existing concurrent programs. Concurrent enrollment courses are college courses taught in high school by qualified high school teachers during the regular school day and offered through a partnership between a high school and a college or university. The grant program was established by the 2015 Minnesota Legislature. The most recent 2023 higher education omnibus bill continues to fund the grant program with \$340,000 each year of the 2024-2025 biennium to support the development of new concurrent enrollment courses in career and technical education.
- The **Minnesota Department of Education** administers the following grant programs related to concurrent enrollment:
 - [Expanded Concurrent Enrollment Grants](#): This grant program provides funding for the development or expansion of concurrent enrollment courses that encourage secondary school students, especially American Indian and students of color, to pursue teaching careers by developing and offering dual-credit postsecondary course options in schools for “Introduction to Teaching” or “Introduction to Education” courses consistent with [Minnesota Statutes 2022, section 124D.09, subdivision 10](#). This program was established by the 2017 Minnesota Legislature and continues to be funded with \$475,000 each year of the 2024-2025 biennium.
 - **Statewide Concurrent Enrollment Teacher Training Program**: This is a single-source grant for the concurrent enrollment teacher partnership under [Minnesota Statutes, section 122A.76](#). \$375,000 is available each year of the 2024-2025 biennium for the development and implementation of a continuing education program to allow eligible teachers to attain the requisite graduate credits necessary to be qualified to teach concurrent enrollment courses.
 - [Expansion of Rigorous Course Opportunities and Support Grants](#): In 2022, \$3.6 million in federal funding was provided for a three-year grant program through CFDA 84.425U, ARP Elementary and Secondary School Emergency Relief (ARP ESSER) Funds to expand access to rigorous course opportunities for students of color, indigenous students, and students with a disability, as well as students in greater Minnesota to prepare and train for career or college. These rigorous courses included: Advanced Placement (AP), International

Baccalaureate (IB), and courses provided through Postsecondary Enrollment Options (PSEO), including Early Middle College and Concurrent Enrollment programs that provide Career Technical Education coursework and/or career pathway opportunities.

Get Ready Program

[Get Ready](#) helps students from low-income backgrounds, indigenous communities, and communities of color realize their aspirations through education and career advancement. Get Ready operates in middle and high schools across multiple districts in Minnesota. Get Ready is funded primarily by the U.S. Department of Education through a federal GEAR UP grant (Gaining Early Awareness and Readiness for Undergraduate Programs). The Minnesota Office of Higher Education administers the Program. The federal GEAR UP program has two objectives: 1) student graduation from high school, and 2) student transition into college (including all types of postsecondary institutions) upon high school graduation.

Minnesota State Scholarships

The 2023 legislature established two significant scholarship programs in the Higher Education Bill to increase students' access to postsecondary education. The North Star Promise provides free tuition to students attending a public higher education institution or tribal college. Students with a family-adjusted gross income below \$80,000 are eligible. The Minnesota American Indian Scholarships include \$8.5 million each year of the 2024-2025 biennium to provide a first-dollar tuition and fee-free pathway for eligible Minnesota American Indian students to complete an undergraduate education.

Support for Teachers

Several grants were included in the 2023 Minnesota Higher Education Bill to support teachers with funding available for underrepresented teacher candidates, student teaching stipends for low-income students teaching in a license shortage area or rural school district, and teacher loan repayment for teachers who teach in a rural district or license shortage area.

The 2023 K-12 Education Bill included funding focused on recruiting, retaining, and diversifying the teacher workforce. The Minnesota Indian Teacher Training Program (MITTP) Grant provides funding (scholarships or stipends) to assist American Indians in becoming teachers. The bill also appropriated funding for a grant to Black Men Teach to establish partnerships with public elementary schools with the goal of increasing the number of black male teachers to 20% of the teachers at each school site. Finally, grant funding supports Grow Your Own – Teacher Diversity to develop programs that encourage secondary school students, especially students of color and American Indian students, to pursue teaching, allowing funding for PSEO courses for “Introduction to Teaching” or “Introduction to Education.”

B. DESCRIBE THE STATE'S STRATEGIC VISION AND SET OF GOALS FOR PREPARING AN EDUCATED AND SKILLED WORKFORCE (INCLUDING SPECIAL POPULATIONS) AND FOR MEETING THE SKILLED WORKFORCE NEEDS OF EMPLOYERS, INCLUDING IN EXISTING AND EMERGING IN-DEMAND INDUSTRY SECTORS AND OCCUPATIONS AS IDENTIFIED BY THE STATE, AND HOW THE STATE'S CAREER AND TECHNICAL EDUCATION PROGRAMS WILL HELP TO MEET THESE GOALS. (SECTION 122(D)(2) OF PERKINS V)

Preparing people for career and life success and meeting the skilled workforce needs of the state requires a close connection among the entities that recruit, support, educate, train, and develop youth and adults. It means ensuring that all individuals possess the knowledge and skills to enter the workforce and have options for strengthening these capabilities over the course of their careers. This preparation and support requires a network of educators, employers, and service providers to make up a local, regional, and state-wide network.

Formulated as part of the transition year's work, Minnesota developed specific statements to guide the Perkins V work. The established vision, mission, and principles for CTE in Minnesota continue to align with the State's WIOA strategic vision, goals, and strategies, underscoring the partnership between the state agencies in this workforce development space. Agency collaboration under the [Minnesota Employment First Policy](#) (E1MN) further supports efforts to prepare a skilled workforce including all Minnesotans.

Below are the vision, mission, principles, and strategic directions for the Minnesota Perkins plan:

Our Vision: Advancing career and technical education empowers every learner to realize a rewarding career.

Our Mission: Quality career and technical education ensures every learner has equitable access to career-connected learning through a network of knowledgeable partners.

Our Principles: We are committed to ensuring:

- An equity lens for all decision-making
- Inclusion of all stakeholders
- Being bold, innovative, and focused on continuous improvement
- Responsiveness to the evolving labor market

The five strategic directions developed by Minnesota State, the Minnesota Department of Education, and the entire planning team validated and guided the work of the Perkins V plan. The Strategic Directions are the following:

Advancing Career and Technical Education

- Comprehensive Needs Assessment
- Accountability
- Outreach
- Awareness and Communication

Career-Connected Learning

- Career pathways
 - Programs of study
- Career preparation
 - Work-based learning (WBL)

Integrated Network

- Business and industry
- State and federal programs; state agencies
- Educational partners
- Consortia/Minnesota State/Minnesota Department of Education

Equity and Inclusion

- Service partnerships
- Providing resources
- Data/data management

Knowledgeable Experts

- Professional development/technical assistance
- Licensure preparation programs
- Mentor/mentee relationships
- Consortia leadership

Our Minnesota focus is on increasing student success by:

- Providing high-quality programs of study connected to high-skill, high-wage, in-demand careers
- Increasing the focus on service to special populations, including the use of statewide Perkins leadership funds and an expansion of community partnerships
- Requiring data-informed decision-making regarding local programs, services, and spending
- Supporting local innovation and program of study improvement through increased reserve funding
- Providing focus and support to recruiting, training, and retaining educational professionals

Preparing students for post-high school graduation opportunities has long been the priority of school districts across the nation; however, the past few decades have generally aimed at “college for all,” with the assumption that “college” means a four-year degree. Our reality is

now driven by global economic needs and the challenge to meet domestic and global workforce demands for jobs that require a combination of academic knowledge and technical skills. Of the careers requiring some type of education, a significant number of them are now requiring a

two-year technical degree and/or credential or certification. Additionally, occupations need a workforce of life-long learners to stay up to date with technology and career area knowledge changes. Current trends are breaking down the silos in which education and workforce sectors often operate, thus leading the Minnesota Department of Education (MDE) to strengthen support to schools and districts in creating the [World's Best Workforce](#) (WBWF) to ensure that school districts and charter schools in Minnesota enhance student achievement through teaching and learning supports.

MDE has identified the skills and accountability measures of the WBWF, Every Student Succeeds Act (ESSA), and Career and Technical Education (CTE) and crafted a new vision for career and college readiness with due emphasis on career readiness domains and competencies. This vision has guided the continued implementation of the [Minnesota Career and College Readiness \(CCR\) Resource Guide](#) for schools, students, and partners to use while supporting student learning. Embracing a well-rounded view of education is necessary to drive educational and workforce goals and policies. Taking many perspectives into consideration, MDE developed a holistic vision of career and college readiness:

A sufficiently prepared student is one who has the knowledge, skills, mindset, and experiences in the academic, workplace, and personal/social domains to keep learning and, beyond secondary school, to successfully navigate toward and adapt to an economically viable career.

To prepare an educated and skilled workforce, including special populations, and to meet the skilled workforce needs of employers, including both existing and emerging in-demand industry sectors and occupations as identified by the state, the CCR Resource is one resource to guide schools and districts through holistic school or district program planning decisions. It can be used either as a systematic guide or as individual pieces that best fit with the current phase of planning or improvement efforts. Four domains and competencies represent Minnesota's vision of career and college readiness: Employability Skills, Mindsets and Social Awareness, Career Development, and Transitional Knowledge.

MDE is committed to establishing coherence between Perkins, the state CTE Vision, the state CCR Vision, WBWF, and ESSA. For example, one can view the "big picture" of preparing all students for education, training, and careers and where the secondary Perkins performance indicators fit within the identified CCR Resource. Career readiness indicators are measured in the secondary system. All the measures are grounded in the commitment and subsequent measures of equity access, participation, representation, and outcomes for all students.

In summary, Minnesota State and MDE recruit and prepare students in CTE through a progression of educational opportunities for students, teachers, and support staff. The progression aligns with the goals of Perkins V to utilize the CLNA in developing local or regional

workforce strategies; supporting the recruitment, preparation, retention, and training of educational professionals; and providing incentives for innovation and improvement of POS. These provisions align with the recognition that rural consortia and consortia with high numbers of CTE students may need additional support to meet the state-determined performance indicators and provide equity of access for all students.

- C. DESCRIBE THE STATE'S STRATEGY FOR ANY JOINT PLANNING, ALIGNMENT, COORDINATION AND LEVERAGING OF FUNDS BETWEEN THE STATE'S CAREER AND TECHNICAL EDUCATION PROGRAMS AND PROGRAMS OF STUDY WITH THE STATE'S WORKFORCE DEVELOPMENT SYSTEM, TO ACHIEVE THE STRATEGIC VISION AND GOALS DESCRIBED IN SECTION 122(D)(2) OF PERKINS V, INCLUDING THE CORE PROGRAMS DEFINED IN SECTION 3 OF THE WORKFORCE INNOVATION AND OPPORTUNITY ACT (29 U.S.C. 3102) AND THE ELEMENTS RELATED TO SYSTEM ALIGNMENT UNDER SECTION 102(B)(2)(B) OF SUCH ACT (29 U.S.C. 3112(B)(2)(B)); AND FOR PROGRAMS CARRIED OUT UNDER THIS TITLE WITH OTHER FEDERAL PROGRAMS, WHICH MAY INCLUDE PROGRAMS FUNDED UNDER THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965 AND THE HIGHER EDUCATION ACT OF 1965. (SECTION 122(D)(3) OF PERKINS V)

As a partner with Minnesota's Combined State Workforce Innovation and Opportunity Act (WIOA) plan, CTE is actively engaged in workforce development planning, coordination, and alignment activities with leadership from both Minnesota State and MDE, partnering with the Governor's Workforce Development Board (GWDB). The GWDB is responsible for advising the Governor on Minnesota's workforce system and represents key leaders from business, education, labor, community-based organizations, and government. The GWDB has a statutory responsibility under WIOA, which provides leadership on opportunities and key workforce strategies for the state. The GWDB provides a venue to build a shared vision and mission. The GWDB is mandated and funded by WIOA and further defined by Minn. Stat., Sect. 116L.665.

In addition, state staff contribute to a variety of workforce initiatives and groups. At the regional and local levels, there is cross-planning, alignment, and coordination with Perkins leadership serving on workforce boards and regional workforce personnel serving on the Perkins leadership teams. These relationships are essential to effective and authentic work in completing the comprehensive local needs assessments. As a strong, local-control state, local or regional work is necessary to achieve the core programs and elements related to the system alignment described in Perkins V and WIOA.

[MDE's Adult Education](#) (ABE) Team oversees services to learners not in the K12 education system to provide English language instruction, diploma options, and postsecondary and career preparation. Many Minnesota two-year colleges are partners with ABE providers with programming and support to help adult learners transition into CTE programs upon attainment of their diploma (high school or high school equivalency). Many Adult Education graduates continue their postsecondary education in CTE programs available at postsecondary institutions.

Perkins V reinforces Minnesota State's and MDE's shared common efforts when it comes to engaging with the Governor's Workforce Development Board (GWDB) and other partners to prepare learners to successfully transition to employment or postsecondary opportunities. The Perkins V initiative, along with other partners, including industry associations and business collations such as chambers of commerce and Minnesota State's Centers of Excellence, engage business and industry for work-based learning (WBL) opportunities, participate in and expand sector partnership efforts championed by business and industry, assist with the design of career pathways, and support collaboration with business and industry to increase opportunities for industry-recognized credentials. The shared interests and overlapping goals between CTE and ESSA ensure that the two federally funded programs share responsibility for secondary student success. Additionally, Perkins V and WIOA share the goal of recognized postsecondary credential attainment for learners.

D. DESCRIBE HOW THE ELIGIBLE AGENCY WILL USE STATE LEADERSHIP FUNDS MADE AVAILABLE UNDER SECTION 112(A)(2) OF PERKINS V FOR EACH OF THE PURPOSES UNDER SECTION 124(A) OF THE ACT. SEE TEXT BOX 2 FOR THE REQUIRED USES OF STATE LEADERSHIP FUNDS UNDER SECTION 124(A) OF PERKINS V. (SECTION 122(D)(7) OF PERKINS V)

Minnesota will use leadership funds to support initiatives and activities aligned with our strategic directions and the key elements identified in the CLNA that drive Minnesota's local application plans. Our approach builds upon successful practices established in previous CTE state plan initiatives, while also embracing the general authority granted by Perkins V. These state leadership activities are designed to meet the requirements stipulated by Perkins V. Activities include:

- Offering technical assistance and professional development to eligible recipients in the implementation of Perkins V plans tailored to their unique needs. This is achieved through monthly webinars and scheduled visits – either virtual or in-person – conducted by a dedicated team of secondary and postsecondary state staff.
- Providing incentive grants to eligible recipients utilizing effective practices in preparing non-traditional and special populations students for careers that are high-skill, high-wage, and in-demand. Recipients are asked to share promising practices at the *CTE Works!* state-wide conference and other professional development events.
- Distributing funds through a Request for Proposal (RFP) process aimed at delivering CTE programming within state-run institutions, such as juvenile justice facilities and correctional institutions. Recipients are asked to share promising practices at the *CTE Works!* state-wide conference and other professional development events.
- Convening the annual statewide *CTE Works! Summit*, a high-priority professional development activity bringing together leaders and educators across the full spectrum of education, workforce, industry, and community organizations. This conference stands as a cornerstone event, emphasizing the exchange of innovative ideas, best practices, and fostering growth and excellence in education and industry alike.
- Targeting technical assistance to local Perkins consortia through a statewide Perkins leaders meeting. This annual event focuses on changes to federal and state legislative

efforts providing professional development and technical assistance to Perkins coordinators who are responsible for the administration and implementation of the Perkins federal grant.

- Funding initiatives for the recruitment, preparation, and retention of career and technical education teachers, faculty, specialized instructional support personnel, or paraprofessionals.
- Creating more opportunities for secondary teachers to meet licensure requirements for programs within CTE, including work-based learning.
- Supporting training for state staff on federal requirements, best practices, and skill development to effectively support sub-award recipients.
- Providing state staff time to continuously improve Minnesota Perkins operations, forms, and processes.
- Providing statewide grant management and distribution of funds.

2) IMPLEMENTING CAREER AND TECHNICAL EDUCATION PROGRAMS AND PROGRAMS OF STUDY

- A. DESCRIBE THE CAREER AND TECHNICAL EDUCATION PROGRAMS OR PROGRAMS OF STUDY THAT WILL BE SUPPORTED, DEVELOPED, OR IMPROVED AT THE STATE LEVEL, INCLUDING DESCRIPTIONS OF THE PROGRAMS OF STUDY TO BE DEVELOPED AT THE STATE LEVEL AND MADE AVAILABLE FOR ADOPTION BY ELIGIBLE RECIPIENTS. (SECTION 122(D)(4)(A) OF PERKINS V)

Minnesota's Perkins V Plan was built on the solid foundation of a development and review process implemented through Perkins IV. Minnesota established a collaborative system in the state's high school and college career and technical education programs. The current system is organized into 23 local consortia. The consortium model brings together secondary teachers and postsecondary faculty and staff, along with business and industry partners, to guide the development, implementation, and continuous improvement of programs of study. Perkins V is an opportunity for our collaborative system to continue ensuring open communication lines between secondary and postsecondary institutions, as well as balancing the labor market needs of the community, region, and State.

The diversity of Minnesota's economy is a success story. Analysis of current economic growth points to strengths across several sectors—from national competitiveness in agriculture and manufacturing to impressive growth in healthcare and professional business services.

Minnesota's resilient economy provides momentum for continued support of career and technical education programs including programs of study in all 16 career clusters. The framework for this continued work includes:

- Marketing
- Business, Management and Administration
- Hospitality and Tourism
- Finance
- Agriculture, Food, and Natural Resources

- Arts, Audio/Video Technology, and Communication
- Information Technology
- Transportation, Distribution, and Logistics
- Architecture and construction
- Manufacturing
- Science, Technology, Engineering and Mathematics
- Health Science
- Education and Training
- Human Services
- Government and Public Administration
- Law, Public Safety, Corrections and Security.

The comprehensive local needs assessment assists the local consortium in the prioritization and validation of the economic cluster and related programs of study that meet local or regional needs. These plans will be based on data-driven decisions made with their local and regional partners.

Minnesota has defined a program of study (POS) as a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary levels that:

- incorporates challenging state academic standards,
- includes both academic and technical knowledge and skills that are aligned with state-approved frameworks including employability skills,
- is aligned with local and regional needs of current and emerging occupations,
- progresses in specificity (beginning with all aspects of an industry or career cluster) and leads to more occupation-specific instruction,
- has multiple entry and exit points that incorporate credentialing, and
- culminates in the attainment of a recognized postsecondary credential.

Support for the development and implementation of programs of study at the local consortium level is provided through state-approved frameworks, career and college readiness resources, work-based learning (WBL) guides, and intentional professional development with teachers, faculty, and Perkins leadership. In addition, individual technical assistance is provided by state staff of Minnesota State and Minnesota Department of Education. Teachers and faculty review programs to ensure industry-aligned competencies and certifications.

- B. DESCRIBE THE PROCESS AND CRITERIA TO BE USED FOR APPROVING LOCALLY DEVELOPED PROGRAMS OF STUDY OR CAREER PATHWAYS (SEE TEXT BOX 3 FOR THE STATUTORY DEFINITION OF CAREER PATHWAYS UNDER SECTION 3(8) OF PERKINS V), INCLUDING HOW SUCH PROGRAMS ADDRESS STATE WORKFORCE DEVELOPMENT AND EDUCATION NEEDS AND THE CRITERIA TO ASSESS THE EXTENT TO WHICH THE LOCAL APPLICATION UNDER SECTION 132 WILL—
 - i. **promote continuous improvement in academic achievement and technical skill attainment;**
 - ii. **expand access to career and technical education for special populations; and**

iii. support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V)

Minnesota's school districts and the two-year colleges of Minnesota State were self-formed into Perkins consortia under Perkins IV to promote collaborative planning and implementation of Career and Technical education programs within their regions. The consortium model supports broader engagement within a region as decisions are made to determine which programs of study would best address the workforce needs of the communities.

In identifying initial membership in the State's Perkins consortia, career and technical education leaders were asked to consider the following for their region of the state:

1. Career and Technical Education program improvement
2. Anticipated programs of study
3. Dual and concurrent enrollment opportunities
4. Collaborative history and culture
5. High school to college matriculation patterns
6. Geographic proximity
7. Continuation of effective collaborative activities that promote high school to college transition
8. A decision-making model that would equitably and effectively address career and technical education programming.

As the state continues to implement the *Strengthening Career and Technical Education in the 21st Century Act* (Perkins V), the consortium model will be the system of delivery for quality career and technical education including addressing workforce development needs and education goals by approving and assessing quality programs of study.

I. PROMOTE CONTINUOUS IMPROVEMENT IN ACADEMIC ACHIEVEMENT AND TECHNICAL SKILL ATTAINMENT;

Initially, Minnesota formed five work groups aligned with the strategic directions to guide our implementation of Perkins V: Advancing CTE, Career-Connected Learning, Integrated Network, Equity and Inclusion, and Knowledgeable Experts. The purpose of the Career-Connected Learning work group was to provide recommendations and decisions that re-set/guided the state in career pathway development from career exploration to employment. Career Connected Learning provided context to core academics through integrated, applied and experiential learning with exposure to career and technical education and a balanced secondary and postsecondary experience. One of the goals of the group included the development of a checklist and two rubrics that defined the minimum criteria for state-recognized programs of study, the second identified strengths or potential opportunities in their state-recognized programs of study, and the third provided measures for continuous improvement for all programs of study. The minimum criteria rubric advanced and refined the previous Rigorous Program of Study checklist that Minnesota implemented in 2012, the MDE program approval guidelines, and the quality standards from the research of national organizations including Advance CTE.

The elements of the rubric (*State-Recognized Programs of Study Guide* on the [Public Comment Notice](#) webpage) to meet the minimum standard for a state-recognized CTE program of study include the following:

1. **Course standards accurately align to the academic, technical, and employability skills learners must master for entry and success in a given career pathway:** Content standards, frameworks and competencies define what students are expected to know and be able to do to enter and advance in college and/or careers comprise the foundation of a POS.
2. **Program of study incorporates active involvement from an integrated network of partners:** Ongoing relationships among education, business, and diverse community partners bolster POS design, implementation, evaluation and maintenance.
3. **Secondary program(s) meets MDE program approval requirements and incorporates courses that lead to postsecondary credits/credentials:** Secondary programs have appropriately licensed teachers and advisory committees, develop and ensure access to equitable student leadership opportunities, and provide career exploration activities leading to postsecondary credits/credentials.
4. **Postsecondary academic program meets Minnesota State Board policy and Higher Learning Commission requirements:** A cohesive arrangement of college-level for-credit courses and experiences, designed to accomplish predetermined objectives, lead to the awarding of a degree, diploma, or certificate.
5. **Materials, Equipment and Resources:** Facilities, equipment, technology and materials used in the program of study reflect current workplace, industry and/or occupational standards and practices for installation, use, maintenance, and safety.
6. **Incorporates authentic work experiences at the secondary and/or postsecondary level that are valued by industry:** POS engage students in authentic work-based learning experiences that demonstrate progressive occupational learning aligned to industry workforce needs.
7. **Program of Study development, improvement and advocacy are supported by findings from a comprehensive local needs assessment:** Systems and strategies for gathering, analyzing, and disseminating needs assessment data are effective for guiding the improvement of POS, and available in plain language to promote POS.

A consortium has a minimum requirement of six state-recognized programs of study. The process for approval of CTE programs of study begins with secondary program approval by the Minnesota Department of Education (MDE). Approved secondary programs are then reviewed by MDE on a 5-year revolving schedule. At the postsecondary level, initial program approval for new CTE college programs is completed by the Minnesota State System Office. Follow-up program review is conducted at the campus level according to Minnesota State and college policies and procedures according to accreditation standards. All consortia submit their programs of study for review on an annual basis as part of the local application for funding. The continuous improvement efforts of the local consortia are documented using the *POS Continuous Improvement Rubric*.

Postsecondary

Minnesota State program approval policy:

[Board of Trustee Policy 3.36 Academic Programs](#)

Part 6. Academic Program Approval

Approval of the chancellor is required for new academic programs, changes to existing academic programs, suspension of academic programs, and closure of academic programs at system colleges and universities.

An approved academic program shall include curricular requirements for earning an academic award, such as credits in general education, a major and/or minor, and all prerequisite courses. The Minnesota State system office shall maintain the academic program inventory and the Office of the Chancellor shall annually report to the Board of Trustees on the status of the inventory. The annual report to the Board will include data and analysis of programs measured against program goals established by the Office of the Chancellor. The goals will be based on aligning program offerings to workforce needs statewide, regionally, and locally in collaboration with the Department of Employment and Economic Development (DEED) and the Governor's Workforce Development Board (GWDB), including data from the state demographer. Only academic programs approved by the chancellor as recorded in the academic program inventory may be offered by Minnesota State colleges and universities.

Secondary

Minnesota Department of Education [Program Approval](#)

Districts, intermediates, cooperatives, and charter schools submit a program approval form to the Minnesota Department of Education (MDE) if they are:

- Applying for a new program.
- Making updates to an existing program.
- Districts up for five-year renewal.

The programs and courses listed within a district's program approval database are the programs and courses that will be reported to MDE in the P-file (Perkins data submission). All programs are subject to program review conducted by the Minnesota Department of Education on a five-year cycle.

II. EXPAND ACCESS TO CAREER AND TECHNICAL EDUCATION FOR SPECIAL POPULATIONS;

The Perkins V strategies to meet the challenges of our special populations come from the analysis at the local or regional level derived from the CLNA and performance gap data. Local consortia are required to document and evaluate how their intentional activities expand access to career and technical education (CTE) for special populations as identified in the comprehensive local needs assessment. The state continues to provide professional development to consortia as defined by the *Strengthening Career and Technical Education for the 21st Century Act*, consortia data review and analysis, applicable national research projects, and recommendations for interventions.

A newly launched [Equity Scorecard](#) developed by the Minnesota State Office of Equity and Inclusion and the Institutional Research Team helps to understand the size and scope of inequities across our campuses and system using key performance indicators. The Equity Scorecard provides another lens to understand the disparities in student success and other key performance indicators that may be aligned to the Perkins CTE performance indicators. This tool has the potential to be leveraged with CTE data to identify action steps that support the success of our underrepresented CTE students by recognizing institutional factors.

The State will continue to support set-aside funding for services to corrections and disabilities for youth and adult populations through competitive community grants and collaborative efforts. These efforts should increase and strengthen partnerships that:

- ensure equitable support for learners to access and persist in training and job preparation;
- foster collaboration for access, equity, and inclusiveness for youth and adult learners with disabilities or those who are justice-involved across agencies and community partners;
- share practices and scale initiatives that address challenges in education and work readiness of those individuals served;
- expand the diversification of collaboration with educators, counselors, coaches, and community service providers that help prepare individuals from marginalized communities for employment and postsecondary career and technical education (CTE).

A component of providing *access for all* to programs is the Office of Civil Rights compliance requirements. Minnesota has demonstrated a long-standing commitment to equity and ensuring that members of special populations are provided equal access to programs. Each year Minnesota State conducts a minimum of four Office of Civil Rights (OCR) compliance reviews. The major purposes of the OCR Compliance Reviews are to ensure that community colleges are providing equal access to CTE through vigorous enforcement of Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Vocational Rehabilitation Act of 1973, and Title II of The Americans with Disabilities Act (ADA). In addition to conducting a minimum of four local OCR On-Site Compliance Reviews each year, Minnesota State provides ongoing technical assistance to community college staff members on equal access.

The Minnesota Department of Education is required to submit to the United States Department of Education, Office for Civil Rights (OCR), a Biennial Civil Rights Compliance Report. It is MDE's responsibility to conduct comprehensive on-site reviews of school districts to address issues of discrimination on the basis of race, color, national origin, sex and disability in vocational education programs. Specialists with the Compliance and Assistance Division within the Minnesota Department of Education will review Minnesota school districts on a cyclic time frame.

III. SUPPORT THE INCLUSION OF EMPLOYABILITY SKILLS IN PROGRAMS OF STUDY AND CAREER PATHWAYS.

Employability skills are a required component of curriculum and instruction in all career and technical programs, and are addressed and validated through the inclusion of work-based learning (WBL) experiences within programs of study and career pathways and all aspects of

MDE's Career and College Readiness work.

WBL provides students the opportunity to become engaged with occupations, employers, and career pathways. There is significant importance for both secondary and postsecondary students to participate in WBL opportunities. The experience gives students a first-hand look into prospective or chosen careers as well as experience in developing employability skills. Students can participate in career exploration to full immersion either in or outside of the traditional school setting. This rich experience for students helps guide them to well-suited career choices. The state supports the local consortium's implementation of WBL in the programs of study. One of the minimum requirements for state-recognized program of study recognition by the state is the inclusion of a WBL opportunity for students. The state supports WBL at the consortium level by providing funding to the consortium to both develop and improve these opportunities for students and provide for professional development and technical assistance.

Opportunities to build career awareness, explore careers, and develop employability, critical thinking and problem-solving skills are provided through work-based learning (WBL) experiences. Local consortia have a range of WBL strategies in programs of study, including simulation, portfolio development, and capstones or employer-aligned experiences such as industry speakers and tours, job shadows, internships, project work, or field experience. WBL is an instructional strategy within the continuum of experiential learning (p. 8, [Work-Based Learning Handbook](#)), which involves an appropriately licensed teacher through the Minnesota Professional Educator Licensing and Standards Board (PELSB), who closely supervises the worksite activities, convenes an advisory committee, and is responsible for the required training plan, training agreement, safety training, seminar course, evaluation of student competencies, and recordkeeping.

The work-based learning (WBL) experience is connected to CTE coursework within a career pathway and the career and technical student organizations (when available) of the career pathway, including, but not exclusively, the WBL career seminar. Training plans for a particular work experience detail the scope and sequence of occupational competencies and employability skills for entering an occupation or postsecondary education. If a student completes multiple work experiences, the training plan should include a progression of acquisition of higher-level competencies. Each student participating in an industry-aligned WBL opportunity must have a training plan developed in collaboration with the WBL coordinator, student, and the employer with competencies identified by the team. These identified competencies must match proposed deliverables/outcomes specified in the training agreement for an identified employment opportunity. Training plans are required to be kept on file at the local school district and be available for review upon request.

This array of opportunities provides Minnesota students with strategies to become career-ready. Students with disabilities have opportunities to participate in WBL, however, there may be times when students with disabilities will require specially designed instruction to meet their educational needs. If an Individualized Education Program (IEP) team determines that is an appropriate service, the district may access additional state funding to modify curriculum and purchase special equipment for students with disabilities enrolled in a WBL program. To be eligible for this funding a district must have an approved Access to Career and Technical Education-Special Education (ACTE-SPED) WBL program. WBL experiences provide students with opportunities to

explore careers, build career awareness and employability skills, and develop critical thinking and problem-solving skills.

Minnesota has codified employability skills within its definition of career and college readiness. Career and college readiness is defined by Minnesota Statutes, section 120B.30, as:

For purposes of statewide accountability, 'career and college ready' means a high school graduate has the knowledge, skills, and competencies to successfully pursue a career pathway, including postsecondary credit leading to a degree, diploma, certificate, or industry-recognized credential and employment. Students who are career and college ready are able to successfully complete credit-bearing coursework at a two- or four-year college or university or other credit bearing postsecondary program without need for remediation.

C. DESCRIBE HOW THE ELIGIBLE AGENCY WILL—

- i. **make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;**
- ii. **facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;**
- iii. **use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;**
- iv. **ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;**
- v. **coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;**
- vi. **support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and**

vii. improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V)

I. AVAILABILITY OF CAREER PATHWAYS INFORMATION

At the state level, career pathway inventories are available through [MN Programs of Study](#) website with information on college credit options, career exploration resources, and the full listing of programs of study by high school, college, career, or pathway. The pathways can be sorted by any of the listed fields. Consortia make more in-depth, local career pathway information available to students, parents, teachers, and faculty.

II. CAREER PATHWAY MULTIPLE ENTRY AND EXIT POINTS

The state is committed to providing support to local consortia and partners to build career pathways that demonstrate the opportunity for multiple entry and exit points. The availability of multiple entry and exit points provides the opportunity for students to enter a career pathway at various stages in their educational experience. The state does not have the authority to mandate to colleges or high schools the structure of the programs and the creation of degree options. However, the state does collectively encourage programs to structure credential attainment in a stackable format. This allows students to enter and stop-out at various life points without losing previously obtained experience and provides opportunities for students to gain both experience in the industry and educational experiences. This includes the ability of singular institutions to offer only portions of a program because of limited physical or human resources. The state encourages collaboration and partnerships between educational institutions to provide credential attainment in a variety of ways and encourages institutions to honor transfers, articulations, dual enrollment agreements, and award credits for prior learning experiences, or competency-based education.

Some circumstances are beyond the control of the CTE units and are governed by other regulatory agencies such as regional accreditation (HLC), state statute, or board of trustee policy. Programs of study provide students with opportunities to stack their credentials and earn credits for prior educational or work experiences. This may be a degree completion or preparation for completion of an industry-recognized credential or re-certification. Institutions are developing programs that have smaller parsed courses that allow students to enroll in courses (or parts) that are needed to complete credentials without having to “re-enroll” and participate in programs that are not needed because of experience or educational completions.

The state reviews all state-recognized programs of study and provides technical assistance to re-design programs to include multiple entry and exit points. The Continuous Improvement Rubric for “program quality” is aligned with Minnesota State, MDE, and the program approval process for schools to self-evaluate the quality of their programs and programs of study in their school districts (not a state evaluation tool). One of the metrics in this tool is to review the multiple entry and exit points. There are many efforts throughout Minnesota State to enhance the entry and exit points in career pathways for various populations such as veterans and ex-offenders.

Minnesota requires consortium formation between secondary and postsecondary. This obligates partners to collaborate on the development of a joint local Perkins application. This application details how each consortium will use funds to develop, coordinate, and implement CTE programs and programs of study. This requirement by the state has been a successful tool in having eligible recipients work together to leverage resources. Efforts to coordinate and improve state-recognized programs of study include consortia collaboration with secondary, postsecondary, [Adult Basic Education](#) (ABE), and workforce agencies. The state supports application and plan development by monitoring and providing feedback on each local plan. In addition, the annual Perkins leadership meetings are designed to support local consortium coordinators with time to network and share learning. Professional development includes sessions on fiscal collaboration with other revenue streams and partners.

The alignment of secondary and postsecondary professional development provides an opportunity to merge work around multiple entry and exit points. For instance, state-recognized programs of study are designed to move students through secondary and postsecondary courses in a particular industry. Although this is a good model, it limits access for adult learners, dislocated workers, and others. The only entry point they have is postsecondary and, unfortunately, too many end up in developmental education instead of postsecondary coursework.

A recent federal law, [Ability to Benefit](#) (ATB), allows individuals who don't have a high school diploma, GED, or equivalent to receive federal grants, loans, and work-study funding to help pay for college. Minnesota State was approved in August 2022 to begin implementing this program. Seven Minnesota State colleges and universities now participate in creating greater access to higher education in career and technical education pathways for adult learners who find themselves without a high school diploma or equivalent.

III. LABOR MARKET DATA

Each consortium is required to conduct local and regional needs assessments throughout the state on a biennial basis. The state utilizes the data collected from local and regional needs assessment to influence conversation at regional levels. This provides some data required to make informed decisions about state-recognized programs of study. The state also has several resources to align state-recognized programs of study to local and regional labor market data. State staff developed a process for conducting an analysis of consortium programs of study. This analysis helps consortia determine which programs of study are offered throughout their region. Perkins state leadership conducts professional development for the consortium leaders and provides technical assistance to utilize a variety of labor market data resources to triangulate both quantitative and qualitative data to analyze what programs are vital to the region. Regional labor market data assists consortium leadership in determining how to support the programs that are deemed high-wage, high-skill, or in-demand and how to align programs to meet the needs of the local needs assessment. There are many resources and collaborations occurring throughout the state to address occupations that are deemed high-wage, high-skill, or in-demand. For example, manufacturing and health care continue to rise to the top as in-demand careers in labor market data information. The state will continue supporting partnerships and collaboration between students, community, and employers in these fields.

Funding sources may be directed to consortia to examine and implement the use of current technology, equipment, or training aids that align directly to local, regional, state, and national standards within the economy. Consortium applications document how they have determined what these needs are and how they came to these conclusions with the support of advisory committees. Programs that do not meet the requirements for size, scope and quality may need to seek other sources of funds for equipment or materials to maintain programs.

IV. EQUAL ACCESS TO APPROVED CTE PROGRAMS

The State will continue to ensure equal access to approved career and technical education for all students with evidence-based practices proven to be successful in the state. Access to Career Technical Education-Special Education (ACTE-SPED) aid is available for contracted services and special equipment to enable students to access CTE courses. Information is disseminated to consortia so that they can continue to access this aid. The state collaborates with consortium leaders to identify best practices for educational program delivery to diverse populations across large geographic boundaries. This includes guidance for small institutions with limited economic means for delivering needed career and technical education programs because of factors that are beyond the state's ability to control.

Campus accessibility coordinators continue to be a resource for postsecondary transition and technical assistance for addressing the needs of students with disabilities. State and national partnerships that provide sources of technical assistance and professional development for postsecondary CTE leaders include: The Minnesota Institute for Community Integration, the Minnesota Inclusive in Higher Education Consortium hosted by the University of Minnesota and Think College Career & Technical Assistance CTE Affinity group.

The availability of resources can be scarce in extremely rural regions. In addition, the diversity of career and technical programs offered in the consortia is vastly different. One of the elements of the local needs assessment reviews the issues of access to special populations.

This provides regional data for the consortia to determine strategies on closing the gap associated with access and opportunities for students in special populations.

Equity gap analysis tools developed by NAPE and Advance CTE are shared with consortia to help identify gaps or barriers to special populations' access to career and technical education. Gap analysis allows the state and local consortia to determine strategic approaches to reducing or eliminating barriers to career and technical educational programming. The state will continue to provide incentive funding for consortia to improve access and opportunity to special populations and to those that have been able to improve and maintain proven career and technical programming and related activities.

The state encourages local consortia to establish stronger working relationships with community-based organizations and Adult Basic Education to expand career and technical opportunities to underserved populations as defined in the law. The state will continue to support consortium efforts to expand career and technical education offerings beyond the

traditional school building. This includes distance delivery of education through various modalities and utilization of industry-supported facilities to eliminate one of the physical barriers. It is evident that many of the barriers to access are caused by the lack of career and technical education teacher licensure or credentialing opportunities. Multiple initiatives are in place to address CTE teacher shortages.

The state continues to fund support services for students with a variety of needs and provide opportunities for students of all abilities to participate in career and technical education wherever practical and applicable. Professional development for educators is provided to aid in the development of curriculum and programs to meet the needs of learners of all ability levels.

V. LOCAL WORKFORCE DEVELOPMENT BOARDS

Local workforce development boards participate in all CTE work in Minnesota and the extent of the involvement is locally controlled. At a minimum, workforce development board members participate in the CLNA. The Minnesota Department of Employment and Economic Development (DEED) regional labor market analysts and career pathway counselors are active participants in this work. The [Career Pathways Tool](#) developed and hosted by DEED is utilized to connect educational programming with labor market data to help align educational outcomes with employment opportunities. This interactive tool provides access to statewide or regional exploration of career fields and cluster employment projections, the education demand in these occupations, and wage data. Local and regional relationships exist between the regional career pathway specialists to assist in providing information for educational programming and career advisement for our learners.

Consortium members participate in career and technical education advisory boards. Workforce center personnel are also part of the local Perkins governance teams in many consortia. Correspondingly, many of our consortium leaders serve on their regional or local workforce development boards.

Minnesota State and Minnesota Department of Education have separate processes for developing and approving career and technical education programs and each state agency has the authority to approve or deny the application based on a variety of criteria. This process does not discriminate between career and technical education or general education programs. The state currently requires consortia to possess six state-recognized programs of study. The state does not dictate or mandate that certain consortia offer certain programs. The consortia determine which pathways are best suited to meet the needs of the students and the region. Secondary and postsecondary approval requires the engagement of a local advisory committee in the ongoing delivery of CTE programs. The state provides resources for programs to utilize in the creation of local advisory committees. Finally, labor market data is required to support the creation of postsecondary career pathways.

Once programs are completed and approved, the program is required to participate in a program review process. State-recognized programs of study are reviewed annually to ensure all the required components exist. The state also strongly encourages the participation in state

career pathway collaborative meetings where secondary teachers, postsecondary faculty, and industry experts develop, edit, and approve competencies and assessments to validate the skills needed for entering graduates.

The state continues to review processes to improve the performance in the areas of career pathway development, program of study development, and local workforce board and education collaboration and partnership. In addition to these mentioned strategies, consortia throughout the state conduct local needs assessments and evaluate the findings. This process influences the decisions to add, improve, modify, or delete career pathways and/or state approved programs of study. It also influences postsecondary program modification through the involvement of established workforce boards.

As part of the development of a continuous improvement rubric, one metric includes evaluating the level of engagement by local workforce boards. The metric evaluates industry and workforce board involvement in the establishment and modifications of career pathways to meet local needs assessments and the needs of the local workforce development boards.

VI. ALL ASPECTS OF INDUSTRY

The state places a strong emphasis on the incorporation of work-based learning (WBL), mentoring, internships, and simulated work environments into career pathways as part of state-recognized programs of study. Many consortia have developed strong collaborations or partnerships with business and industry to provide experiential learning opportunities for students. Consortia provide opportunities for students to engage with business and industry on a variety of levels from exploration to employment in various stages of their education. Engagement with industry experts offers teachers and faculty the opportunity to learn alongside the students, including access to externships to learn more about relevant industry skills to teach students.

One of the metrics the state has examined is the incorporation of work-based learning (WBL) for students as a program quality indicator. This may include simulated work environments such as health care simulation laboratories or other simulated industry experiences. The state continues to investigate the impact of requiring that all identified state-recognized programs of study (which includes both the secondary and postsecondary levels) provide the opportunity for some form of WBL for students including youth apprenticeships, internships, co-operative experiences, clinical and practicum experiences, entrepreneurship, work simulations, or other forms of WBL. In addition, every state-recognized program of study already includes career exploration, preparation, and guidance provided by both educators and industry professionals. Several of the consortia are using Perkins funding to provide opportunities for rigorous, long-term, and sustained career exploration with hands-on experiences that are relevant and current in the industry. The state will continue to provide technical support and professional development for these types of WBL opportunities. In addition, Minnesota State, Minnesota Departments of Education, Employment and Economic Development, and Human Services partner to provide secondary schools with collaborative guidance to ensure that WBL experiences meet the requirements of WIOA, Olmstead and other labor laws. The state provides

technical assistance, evidence-based practice, and resources on proven strategies for local school districts and colleges to implement more and create new WBL experiences for students.

VII. IMPROVEMENTS IN GAPS OF PERFORMANCE

Secondary and postsecondary reports highlighting performance gaps are made available to local recipients to help prioritize needs in the CLNA and application process. Technical assistance is provided to help interpret performance data and develop strategies to improve outcomes and reduce performance gaps for CTE concentrators. In addition, the state prioritizes the use of reserve funds to address performance gaps.

The state continues to link CTE coursework to hands-on relevant work-based learning (WBL) experiences, using a scaffolded framework of employability skills development as part of the work experience seminar. The enhanced connection to WBL and development of employability skills have the potential to increase student retention, engagement, graduation rates and academic performance. Consortia continue to be encouraged to strengthen intentional connections to regional workforce development centers within consortia and local school districts to identify workforce skill training needs for all students/workers including special population students. Programs of study are reviewed for their responsiveness to local needs assessments and delivered with fidelity to address workforce and workplace needs.

D. DESCRIBE HOW THE ELIGIBLE AGENCY, IF IT OPTS TO DO SO, WILL INCLUDE THE OPPORTUNITY FOR SECONDARY SCHOOL STUDENTS TO PARTICIPATE IN DUAL OR CONCURRENT ENROLLMENT PROGRAMS, EARLY COLLEGE HIGH SCHOOL, OR COMPETENCY-BASED EDUCATION. (SECTION 122(D)(4)(D) OF PERKINS V)

Minnesota has been increasing postsecondary opportunities for students through multiple approaches and offers dual enrollment opportunities for students under the [Postsecondary Education Options \(PSEO\) Act](#), which includes postsecondary courses taught at the college and/or at the high school through concurrent enrollment. By participating in these dual enrollment options, high school students complete both high school graduation requirements and college requirements that allow for greater flexibility when they enter the postsecondary setting full-time. Students may benefit from cost-savings and a shorter time to credential completion. State law and consortium regional articulation agreements support planning and funding early college opportunities and ease the transition from secondary to postsecondary.

Eligibility for secondary students to access PSEO on a college campus includes participation in postsecondary CTE programs for 10th, 11th, and 12th-grade students. Transcripts at the secondary and postsecondary levels document course completion. Tuition, fees, and books for PSEO students who earn dual credit are paid by the Minnesota Department of Education to the colleges and universities in which PSEO students are enrolled. The state also provides support to pay the cost of transportation for low-income students attending college courses on a postsecondary campus. In addition to financial provisions to support access to college course-taking opportunities for students, policy holds both institutional partners accountable for offering support services to students both prior to and during enrollment in the PSEO program.

The Minnesota Department of Education developed a [Postsecondary Enrollment Options Reference Guide](#), updated November 2021, which provides definitions of postsecondary options, eligibility of students, and participation requirements including students with Individualized Education Programs (IEP). The guide also includes information for students, parents, districts, and postsecondary institutions. The Minnesota Automated Reporting Student System (MARSS) collects enrollment and demographic student data using a unique student identification system. The system allows MDE to track student enrollment and postsecondary enrollment option participants.

Minnesota's concurrent enrollment partnerships offer thousands of Minnesota students access to rigorous college courses at their local high school. Research shows that high school students who participate in accelerated learning options, such as concurrent enrollment, benefit greatly from:

- Exposure to high expectations.
- Participation in challenging courses.
- The momentum gained by earning college credits while still in high school.

Minnesota's concurrent enrollment program has one of the most extensive policy structures in the country to support high school instructors teaching college courses. All concurrent enrollment programs must adopt and implement the National Alliance of Concurrent Enrollment Partnership's (NACEP) program standards and receive accreditation (Minn. Stat. 124D.091, Subd.1). Secondary and postsecondary institutions are required to sign a concurrent enrollment agreement that provides for the following assurances: determination of qualifications and responsibilities of high school instructors, postsecondary supports for instructors, resources needed to support teaching and learning, regular communication and professional development between postsecondary faculty and high school instructors, and approval of high school instructors to teach college courses by the college or university partner.

Partnerships developed between university faculty and high school teachers provide learning and training opportunities that may not otherwise exist. Additionally, concurrent enrollment students stay at the high school instead of leaving to attend classes at a university. This allows the student to continue their learning within their high school community and eliminates the transportation barrier that might be experienced if the student needs to travel to the local college. Finally, through participation in concurrent enrollment, high schools establish themselves as education leaders by setting high standards, providing outstanding offerings, and preparing students for the 21st century.

All twenty-six two-year colleges in the Minnesota State system participate in dual enrollment and offer these opportunities to high school students. In 2022, over 46,500 high school students gained over 448,000 college credits via dual enrollment, and participation in dual enrollment has grown by 62% since 2013. This statistic includes career and technical educational coursework.

Professional development is an essential part of successful dual enrollment activities. The Minnesota State system office provides a variety of professional development opportunities for internal staff and external partners specific to dual enrollment opportunities and requirements. Monthly webinars for campus concurrent enrollment directors include sharing best practices, providing policy guidance, and presenting information relevant to effective program implementation. Additionally, Minnesota's NACEP-affiliated chapter, Minnesota Concurrent Enrollment Partnerships (MnCEP), offers annual winter and summer conferences, providing opportunities to learn more about NACEP standards, how to implement them, and how to prepare a strong portfolio for accreditation.

For PSEO programming, where high school students take college courses on the college campus, bi-monthly PSEO Connect meetings and an annual summer convening provide professional development opportunities for college program coordinators and staff on the specific program needs of this model. Technical assistance is provided as specialized support for PSEO programming with students enrolled in the state-approved alternative high schools.

Two major challenges persist with dual enrollment:

1. The barriers created by the misalignment of secondary teacher licensure requirements and postsecondary minimum qualifications in the same or similar content areas.
2. The recruitment and support of nonwhite students into dual enrollment opportunities.

E. DESCRIBE HOW THE ELIGIBLE AGENCY WILL INVOLVE PARENTS, ACADEMIC AND CAREER AND TECHNICAL EDUCATION TEACHERS, ADMINISTRATORS, FACULTY, CAREER GUIDANCE AND ACADEMIC COUNSELORS, LOCAL BUSINESSES (INCLUDING SMALL BUSINESSES), LABOR ORGANIZATIONS, AND REPRESENTATIVES OF INDIAN TRIBES AND TRIBAL ORGANIZATIONS, AS APPROPRIATE, IN THE PLANNING, DEVELOPMENT, IMPLEMENTATION, AND EVALUATION OF ITS CAREER AND TECHNICAL EDUCATION PROGRAMS. (SECTION 122 (D)(12) OF PERKINS V)

The groups listed in Section 122(d)(12) of Perkins V continue to be engaged in the planning, development, implementation, and evaluation of career and technical education programs through the established CLNA process. In addition, one of the minimum requirements of state-recognized programs of study is to engage an integrated network of partners. These groups assist with identifying and prioritizing local needs in the CLNA process. Participating as members of secondary and postsecondary advisory committees, the groups assist in the development and continuous improvement of programs of study. All programs of study are published on the [Minnesota State Programs of Study Search webpage](#) to increase awareness of programs offered to members of the public.

- F. INCLUDE A COPY OF THE LOCAL APPLICATION TEMPLATE THAT THE ELIGIBLE AGENCY WILL REQUIRE ELIGIBLE RECIPIENTS TO SUBMIT PURSUANT TO SECTION 134(B) OF PERKINS V. SEE TEXT BOX 4 FOR THE STATUTORY REQUIREMENTS FOR LOCAL APPLICATIONS UNDER SECTION 134(B) OF PERKINS V.

In compliance with section 134(b) of Perkins V, the local application template was developed for the original Perkins V Four-Year State Plan. The *Perkins V Local Application* template has been revised and updated based on user feedback. The final document will be submitted to OCTAE with the 2024 State Plan.

- G. INCLUDE A COPY OF THE COMPREHENSIVE LOCAL NEEDS ASSESSMENT TEMPLATE AND/OR GUIDELINES THAT THE ELIGIBLE AGENCY WILL REQUIRE OF ELIGIBLE RECIPIENTS TO MEET THE REQUIREMENTS OF SECTION 134(C) OF PERKINS V. SEE TEXT BOX 5 FOR THE REQUIREMENTS FOR THE COMPREHENSIVE LOCAL NEEDS ASSESSMENT UNDER SECTION 134(C) OF PERKINS V.

To meet the requirements of section 134(c) of Perkins V the *Comprehensive Local Needs Assessment Guide* and *Framework* have been developed for the original Perkins V plan. Based on user feedback, the CLNA Framework has been revised and renamed as the *CLNA Results and Priorities* template. The final document will be submitted to OCTAE with the 2024 State Plan.

- H. PROVIDE THE ELIGIBLE AGENCY'S DEFINITION FOR "SIZE, SCOPE, AND QUALITY" THAT WILL BE USED TO MAKE FUNDS AVAILABLE TO ELIGIBLE RECIPIENTS PURSUANT TO SECTION 135(B) OF PERKINS V.

For the implementation of this updated Perkins V plan, Minnesota has reviewed its criteria for defining consortia using the lens of size, scope, and quality. The consortium's configuration moving forward will need to meet the criteria below:

Criterion 1: Membership:

- Minimum of one school district plus one postsecondary Minnesota State College

Criterion 2: Programs of Study

- Minimum of 6 state-recognized programs of study
 - Of these 6 POS, a minimum of 4 career fields must be represented
 - All components of 3 of the 4 POS by career field must be provided within the consortium

Criterion 3: Student Enrollment

- Greater than 1,000 CTE participants at the secondary level
 - Greater than 1,800 FYE at the postsecondary level
- The definitions and headcount used for participants and FYE are based on 2023 academic data.

Criterion 4: Consortium Allocation

- Federal legislation requires that no consortium receive less than \$50,000.
- If, by formula, a consortium would receive less than this amount, they would need to reconfigure their constituency to remain viable.

Minnesota defines size, scope, and quality at the program level as documented below. However, the state will continue to review and potentially revise these components as we collect information from the comprehensive local needs assessments.

Size

- Size is the most context-dependent variable, so specific numbers are not provided. This includes parameters/resources that affect whether the program can adequately address student-learning outcomes, such as:
 - Number of students within a program
 - Number of instructors/staff involved with the program
 - Number of courses within a program
 - Available resources for the program (space, equipment, supplies)

Scope

- Programs of study are part of or working toward inclusion within a clearly defined career pathway with multiple entry and exit points (minimum of 6 state-recognized programs of study offered within a consortium).
- Programs of study are aligned with local workforce needs and skills.
- Postsecondary programs connect with secondary career and technical education via articulation agreements and/or dual credit, etc.
- Programs develop not only specific work-based skills, but also broadly applicable employability skills.

Quality

- A program must meet two out of the following three criteria: the program develops (1) high-skilled individuals, (2) individuals who are competitive for high-wage jobs, and (3) individuals who are trained for in-demand occupations.
 - High-skilled: programs that result in industry-recognized certificates, credentials, or degrees
 - High-wage: a high wage is anything that is above the median wage for all occupations (\$47,986 based on 2021 data from the Minnesota Department of Employment and Economic Development)
 - In-demand: occupations identified in DEED's [Occupations in Demand](#) and/or through local needs assessment.
- A program or activity must work toward closing student equity gaps in access and completion (e.g., reducing barriers to students, implementing guided pathways, providing recruitment).
- A program must work toward effectively using data to inform and improve student learning.
- Approved programs meet the requirements of MDE or Minnesota State policies and rules.
- Implementation of a continuous program improvement process approved in the local application.
- Activities must support or be collaborations with POS.

Waivers to uses of funds that do not meet the size, scope, and quality criteria at the consortium or local level will be handled on an individual basis at the time of the local application review or as consortia make requests to change their original submissions.

3) MEETING THE NEEDS OF SPECIAL POPULATIONS

- A. DESCRIBE THE ELIGIBLE AGENCY'S PROGRAM STRATEGIES FOR SPECIAL POPULATIONS, INCLUDING A DESCRIPTION OF HOW INDIVIDUALS WHO ARE MEMBERS OF SPECIAL POPULATIONS—
- i. **will be provided with equal access to activities assisted under this Act;**
 - ii. **will not be discriminated against on the basis of status as a member of a special population;**
 - iii. **will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;**
 - iv. **will be provided with appropriate accommodations; and**
 - v. **will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)**

I. WILL BE PROVIDED WITH EQUAL ACCESS TO ACTIVITIES ASSISTED UNDER THIS ACT;

All Minnesota students deserve high-quality learning opportunities that lead to workforce readiness and access to further learning. The pursuit of educational equity recognizes the historical conditions and barriers that have prevented opportunity and success in learning for students based on their race, gender, language, disability, income, and other social conditions. All stakeholders must work intentionally and collaboratively to correct these realities. Our Perkins principles state that we are committed to ensuring an equity lens for all decision-making. Minnesota's World's Best Workforce, the Every Student Succeeds Act (ESSA), and Minnesota's Commitments to Equity require meaningful inclusion of all students in the system and holding every public school accountable for the outcomes of each student group.

Equity is different from equality. Although equality demands that everyone is treated the same, equity recognizes the unique identity of a student that is too often impacted by racism, bigotry, or bias. Equity corrects these realities through conversations, actions, and distribution or redistribution of resources based on individual and group needs to eliminate structures and barriers to ensure equitable outcomes. By eliminating systemic barriers and biases, well-implemented Career and College Readiness (CCR) programs improve outcomes for underserved students and benefit everyone. Commitments to equity provide the framework for school- and district-level actions that will result in greater access, participation, representation, and attainment of CCR skills for all students.

Applying specifically to Perkins-funded activities, all local consortium applications are reviewed by Minnesota State and Minnesota Department of Education staff to ensure that discrimination against members of special populations in learning, student recruitment and support services, and physical accessibility is not apparent in written goals, objectives, strategies, or policies. It is an expectation that each local consortium will identify how the needs of special populations of students will be met to ensure that each learner can be successful and experience the same rigorous career and technical education programs leading to high-skill, high-wage, or in-demand occupations.

Minnesota will continue to emphasize developing strategies that focus not just on prioritizing student recruitment but also on adopting evidence-based approaches and resources that ensure learner success. This work includes three broad categories:

1. Shared Practices
 - a. Sharing practices for supporting students in special populations, especially students with disabilities, English language learners, the homeless, and non-traditional CTE programs. Outreach through campuses and community-industry partnerships, for example, will be utilized to educate local consortia and support partnerships for communities of practice to address equity in CTE programs.
 - b. Provide professional development to educators and faculty--through our annual CTE conference, webinars, and other venues-- on effective tools and strategies for supporting learners and ensuring equity and access to effective support services, without regard to race, color, national origin, gender or (dis)ability.
2. Technical Assistance
 - a. Provide support to institutions challenged with performance or compliance areas by hosting technical assistance sessions, resources, etc., to address their challenges and ensure the success of special populations.
 - b. Provide one-on-one consultation or other assistance to address barriers to access and participation in CTE programs. Partnerships from local and national sources are leveraged to examine equity challenges, priorities, and research.
3. Partner Engagement
 - a. Extend outreach to include community and industry input on meaningful and quality CTE opportunities and experiential learning. Provide opportunities for funding through an RFP grant process to support these efforts and scale practices.
 - b. Active engagement and participation with Minnesota State committees and other partners also focused on equity and access for student populations.

II. WILL NOT BE DISCRIMINATED AGAINST ON THE BASIS OF STATUS AS A MEMBER OF A SPECIAL POPULATION

Under Perkins V, Minnesota will continue to follow the Office of Civil Rights guidelines and requirements. OCR Guidelines require each state agency receiving federal financial assistance that offers or administers vocational education programs to develop and implement a program to monitor compliance with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973. Compliance with the law will include a review of institution documents and publications containing Title VI, Title IX, and Section 504 policy statement(s) of nondiscrimination; language or media used in public notifications other than English if necessary; and statement(s) or write-up(s) used to notify the public of nondiscrimination in career and technical opportunities including date(s) issued.

Minnesota State has adopted the general philosophy that this compliance program be perceived and projected as an opportunity to put students first and to improve the learning environment through activities that allow the system to examine the status of existing conditions, identify problems that exist, plan and implement correction and/or improvement, and provide the changes as opportunities for improvement across the Minnesota State system.

In addressing our secondary student population, the Minnesota Department of Education Civil Rights Compliance Review program is designed to ensure that all groups and populations have an equal opportunity to access their education:

- Review data and records, interview staff and students, administer a survey, and examine facilities for accessibility.
- Prepare a letter of findings, detailing areas that are out of compliance, and assist with the development of a voluntary compliance plan that outlines what will be done to come into compliance.
- Assist with completing the items on a voluntary compliance plan, including providing technical assistance and sample policies and procedures.
- Provide technical assistance to consortia to help address challenges that improve the success of special populations. This may include strategies such as one-on-one sessions to support improvement plan development, sharing resources, or utilizing experts for specific special populations.

Secondary

The Minnesota Department of Education is required to submit to the United States Department of Education, Office for Civil Rights (OCR), a Biennial Civil Rights Compliance Report. It is MDE's responsibility to conduct comprehensive on-site reviews of school districts to address issues of discrimination based on race, color, national origin, sex and disability in vocational education programs. Specialists with the Compliance and Assistance Division within the Minnesota Department of Education will review Minnesota school districts on a cyclic time frame.

Postsecondary

Minnesota State has demonstrated a long-standing commitment to equity and ensuring that members of special populations are provided equal access to programs. Each year Minnesota State conducts a minimum of four Office of Civil Rights (OCR) compliance reviews. The major purposes of the OCR compliance review are to ensure that community colleges are providing equal access to CTE through vigorous enforcement of civil rights in compliance with the requirements of Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Vocational Rehabilitation Act of 1973, and Title II of The Americans with Disabilities Act (ADA). In addition to conducting a minimum of four local OCR On-Site Compliance Reviews each year, Minnesota State provides ongoing technical assistance to community college staff members on equal access.

Both the Minnesota Department of Education and Minnesota State provide professional development to staff and Perkins consortia leadership as well as teachers and faculty. The Office

of Equity and Inclusion and the Office of General Counsel also provide professional development.

The Minnesota State Board of Trustee Policy 1B1 addresses Equal Opportunity and Nondiscrimination in Employment and Education. Individual campuses are also required to apply the Minnesota State Board of Trustee Policy or implement a local policy providing not less than the system criteria.

Minnesota State Board of Trustee Policy 1B1

Part 1. Policy Statement.

Subpart A. Equal opportunity for students and employees. Minnesota State Colleges and Universities has an enduring commitment to enhancing Minnesota's quality of life by developing and fostering understanding and appreciation of a free and diverse society and providing equal opportunity for all its students and employees. To help effectuate these goals, Minnesota State Colleges and Universities is committed to a policy of equal opportunity and nondiscrimination in employment and education.

Meeting the Needs of Special Populations

MDE's Equity Statement follows: Educational equity is the condition of justice, fairness, and inclusion in our systems of education so that all students have access to the opportunities to learn and develop to their fullest potential. The pursuit of educational equity recognizes the historical conditions and barriers that have prevented opportunity and success in learning for students based on their race, income, and other social conditions. Eliminating those structural and institutional barriers to educational opportunities requires systemic change that allows for distribution of resources, information, and other support depending on the student's situation to ensure an equitable outcome. For example, within the Minnesota Department of Education, there is an effort to improve alignment of CTE work with ESSA initiatives. We support and collaborate with state specialists and educators in our special education division, homeless student liaison staff, as well as our English learner division, all of whom have a strong start toward reducing and eliminating performance gaps.

Minnesota State has identified the following goal: "By 2030, Minnesota State will eliminate education equity gaps at every Minnesota State college and university." This goal is known as "Equity 2030."

Minnesota's Perkins V priorities align with Equity 2030's focus areas:

- Enhancing access and student success
- Providing Minnesota with the talent it needs
- Anchoring the communities and regions we serve

Meeting the needs of special populations under Perkins V involves similar efforts to Minnesota State Equity 2030 goals:

- Improve outcomes for student populations
- Data disaggregation (analysis)
- Technical assistance to address systemic inequities
- Provide recommendations for equity-minded approaches

III. WILL BE PROVIDED WITH PROGRAMS DESIGNED TO ENABLE INDIVIDUALS WHO ARE MEMBERS OF SPECIAL POPULATIONS TO MEET OR EXCEED STATE DETERMINED LEVELS OF PERFORMANCE DESCRIBED IN SECTION 113, AND PREPARE SPECIAL POPULATIONS FOR FURTHER LEARNING AND FOR HIGH-SKILL, HIGH-WAGE, OR IN-DEMAND INDUSTRY SECTORS OR OCCUPATIONS;

One of the strategies in place to help special populations meet or exceed state levels of performance involves providing awareness of and recruitment into programs of high-skill, high-wage, or in-demand sectors or occupations. Continuous professional development including a series of webinars on special populations, collaborative projects, and state leadership conferences for our coordinators provide multiple opportunities for shared practices, tools, and strategies.

Minnesota has developed, supported, and encouraged the use of electronic career guidance tools for raising awareness of career options. Examples of guidance tools for learners to explore and build individual career plans include the [Minnesota Career Information System](#) (MCIS), [CareerWise](#), and the [Disability Hub](#), sponsored by the Minnesota Department of Human Services and multiple state agencies. The website has transition information for students with disabilities, including information about [E1MN](#)--Minnesota's state agency partnership to advance Employment First outcomes for youth and adults with disabilities.

Minnesota State continues to provide CTE equity capacity-building grants. This funding program supports consortium efforts for actionable steps in addressing equity priorities identified in the CLNA. Funding supports capacity issues relating to activities, such as policy analysis and review (e.g. the review or establishment of equitable processes), community engagement, and partnerships.

Minnesota uses many data tools to provide research and additional useful information about available career options. These tools also provide information on non-traditional careers and career options for ex-offenders. Examples include:

1. Career profile integration – [Accountant example](#)
(includes job counts, top employers, top skills, top certifications, and links to job postings)
2. Industry profile integration – [Utilities business example](#)
(includes top employers, links to job postings)

3. Minnesota State CAREERwise – [Integrated job search tool](#) (includes job postings and multiple options to filter data)
4. [Minnesota Career Information System](#) (MCIS) – online career exploration system, including Junior (middle school), Special Education, and Adult Basic Education versions
5. Tools and insights into career clusters through the lens of [employer demand](#)

In summary, efforts to address equity in CTE will focus on four pillars that are guided by federal requirements:

- Professional development programs (**capacity and competency**)
- Address equal access to activities under this Act (**existing programs**)
- Programs that help special populations meet or exceed state performance (**interventions and innovation**)
- Non-discrimination (**compliance**)

To provide actions in support of these four pillars, the Minnesota Perkins team engages in the following:

- Professional Development for faculty, teachers, counselors, and staff to address disparities including underrepresentation in nontraditional career programs. Further professional development on the impact of poverty and implicit bias on classroom teaching practices, student engagement and advising. Education Innovation Faculty development can also serve as a source for delivering equity training.
- Technical Assistance to local consortia on equity assessment of programs of study, supports for special populations and campus or school environment. The Minnesota State Office of Equity and Diversity can serve as one of many resources for technical assistance.
- Community and Employer Engagement to broaden outreach to community-education-employer partnerships (and communications) about the opportunities and value of CTE for career development and work preparation.
- System approaches to support shared best practices among diverse geographic regions of state on strategies and delivery methods proven effective in expanding the educational experiences and nontraditional career options for special populations. Use of incentivized support to replicate or scale proven practices. Community organizations, workforce centers and state agencies are invited via RFP process and state register notification to apply for funding to support corrections and disabilities services.
- Compliance and Non-discrimination: both internal and external partners, such as OCR compliance officers, are engaged to identify and develop system strategies and technical assistance needed for addressing disparities or equity related performance gaps.
- Provide incentive and capacity-building funding to support innovation for initiatives that increase the success of special populations. Metrics and measurements related to support requires the disaggregation of Perkins data regarding performance on core indicators and the support for the redistribution of funds to support equity.

IV. WILL BE PROVIDED WITH APPROPRIATE ACCOMMODATIONS;

Equal opportunity to enter CTE programs, services, and activities requires equal access for

learners with special needs as compared to the general student population. Such provisions are

reviewed for compliance throughout all required accountability indicators. Specific strategies to address learner accommodations include auxiliary or related aids and services, modified instructional equipment, and modified or adapted course offerings. Accommodations are provided for persons with disabilities in regular or special needs occupational programs.

Accommodation services are publicized and encouraged by teachers, faculty and staff. Students with IEPs are assessed for career interests and abilities. The IEP reflects [career] education and training leading to the outcome of competitive, integrated employment (ACTE-SPED, MN Department of Education).

V. WILL BE PROVIDED INSTRUCTION AND WORK-BASED LEARNING OPPORTUNITIES IN INTEGRATED SETTINGS THAT SUPPORT COMPETITIVE INTEGRATED EMPLOYMENT. (SECTION 122(D)(9) OF PERKINS V)

Work-based learning (WBL) provides appropriate accommodations for students of various ability levels. All students, regardless of abilities, must have impactful experiences. WBL experiences provide:

- Guidance to schools and employers on perceptions of quality WBL and value to all student populations.
- WBL experiences and activities that offer high quality content and curriculum, including a range of levels from exploration (experiential learning) to work experience, career preparation and instruction that is “stackable” and explores multiple aspects of a targeted industry or occupation.
- WBL that has quality content and learning experiences as an integral part of CTE, supporting meaningful career development.

At the secondary level, appropriate accommodations, and support for a competitive, integrated work environment for students with disabilities are undergirded by [Minnesota’s Olmstead Plan](#). Named after a United States Supreme Court decision, the Olmstead Plan is a statewide comprehensive plan to provide people with disabilities opportunities to live, learn, work, and enjoy life in integrated settings. The plan calls out multiple education-related goals, including those listed below, requiring the support of career and technical education at the secondary level:

- By June 30, 2025, the number of students with developmental cognitive disabilities, ages 19-21, that enter competitive integrated employment through the Employment Capacity Building Cohort (ECBC) will be 1,513.
- By June 30, 2025, the percentage of students with disabilities who have enrolled in an integrated postsecondary education setting within one year of leaving high school will increase to 34.8% (from baseline of 29.8%).

To that end, secondary career and technical education programs will provide appropriate accommodations and support for a competitive, integrated work environment through a variety of strategies targeted specifically at work-based learning (WBL) programs. These strategies will increase the quality of programs, enhance educator expertise, and capitalize on

partnerships with other state agencies.

High-Quality Work-based Learning Programs

Every five years, school districts will engage in a formal program approval process for work-based learning (WBL) programs specifically designed for students with disabilities. The program approval process, as outlined by administrative rule, identifies the minimum requirements needed to ensure all students engage in a well-designed work experience aligned to their interests and skills. Once a school district's program is approved, the district may access additional state funding to modify curriculum and purchase special equipment for students with disabilities enrolled in the WBL program.

Educator Expertise

The Minnesota Department of Education (MDE) will provide direct technical assistance to teachers who work with students with disabilities to ensure that work-based learning (WBL) programs are well-designed to align with students' interests and skills. Additionally, MDE will coordinate professional development for WBL coordinators with programming related to competitive, integrated work environments.

Partnerships

Minnesota Department of Education staff will continue to work closely with colleagues as part of the Employment First Minnesota (E1MN) partnership. E1MN is Minnesota's state agency partnership to advance Employment First outcomes for youth and adults with disabilities. E1MN is led by the State of Minnesota Departments of Education (Career and Technical Education and Special Education), Employment and Economic Development (Vocational Rehabilitation Services and State Services for the Blind), and Human Services (Disability Services Division) to ensure each agency, when possible, uses similar language and processes when working with school districts to provide high quality work-based learning (WBL) experiences for students with disabilities and to eliminate barriers that prevent school districts from offering these programs.

4) PREPARING TEACHERS AND FACULTY

- A. DESCRIBE HOW THE ELIGIBLE AGENCY WILL SUPPORT THE RECRUITMENT AND PREPARATION OF TEACHERS, INCLUDING SPECIAL EDUCATION TEACHERS, FACULTY, SCHOOL PRINCIPALS, ADMINISTRATORS, SPECIALIZED INSTRUCTIONAL SUPPORT PERSONNEL, AND PARAPROFESSIONALS TO PROVIDE CAREER AND TECHNICAL EDUCATION INSTRUCTION, LEADERSHIP, AND SUPPORT, INCLUDING PROFESSIONAL DEVELOPMENT THAT PROVIDES THE KNOWLEDGE AND SKILLS NEEDED TO WORK WITH AND IMPROVE INSTRUCTION FOR SPECIAL POPULATIONS. (SECTION 122(D)(6) OF PERKINS V)

Minnesota will continue to prioritize the recruitment, retention, and preparation of CTE educators and support them in their professional and educational development so they can teach, lead, support, and work with a diverse range of students, including special populations and communities of color, immigrant and refugee communities, Tribal Nations, and indigenous people.

The [2023 Biennial Minnesota Teacher Supply and Demand Report](#) prepared by the Minnesota Professional Educator Licensing Standards Board (PELSB) found that Minnesota school districts are facing a shortage of licensed teachers across grade levels and in most disciplines. Licensure areas with a high percentage of teachers on special permission (out of their licensure area or without a standard teaching license) include Career and Technical Education fields, world languages, special education, and STEM. The report also noted that the percentage of teachers of color remains stagnant while the percentage of students of color continues to grow. Particularly concerning is the teacher shortage in all CTE licensure areas.

The continued focus that supports these efforts includes:

- Providing more support for teaching and learning resources for college technical faculty.
- Supporting initiatives focused on prospective CTE teachers of color as they pursue licensure.
- Emphasizing culturally responsive teaching and learning strategies for all educators.
- Continuing to convene a [statewide CTE conference](#) serving secondary and postsecondary educators, industry partners, and CTE leaders focused on sharing evidence-based practices in CTE.
- Assessing pathways for non-licensed educators (paraprofessionals) to pursue CTE licensure.
- Providing mentoring and coaching for new CTE teachers.
- Supporting activities and collaborations across organizations that actively strive to retain CTE educators.
- Increasing and diversifying the secondary educator workforce across the state through local legislative grant funds.
- Supporting professional learning communities for new CTE teachers.
- Supporting local professional and educational development pursuits for all educators.
- Supporting alternative paths to CTE teacher licensure.
- Collaborating with local CTE professional organizations that support CTE educators and administrators.

Secondary

- The Minnesota [Career and Technical Educators Teacher Induction Program](#) (CTE TIP) program is a partnership with the Minnesota Association of Career and Technical Education (MNACTE) designed to help teachers gain the knowledge and resources they need to be successful in the secondary CTE classroom. CTE TIP functions as a professional learning community to support the development, efficacy, success, resilience, and retention of new CTE teachers. Mentoring and professional networking are offered through in-person conferences and virtual settings.
- The Minnesota Department of Education recently launched the [Educator Workforce and Development Center](#). The Center will lead the implementation and establishment of programs being built or expanded out of the 2023 legislative session and the continued oversight of existing workforce education programs and will focus on programs to support districts, schools, communities, and Tribal Nations in work to recruit, diversify, develop, and retain educators. Center staff will build partnerships with other state agencies and the education community.
- Through multiple state grants, the Minnesota Department of Education will continue to increase and diversify the educator workforce with the support of the governor's office through its [Increase and Diversify the Educator Workforce Initiative](#). Specific goals and activities are determined in alignment with local Perkins CLNA results combined with the overall needs of the state.
- Education for students with disabilities, appropriate accommodations, and support for a competitive, integrated work environment for students with disabilities are undergirded by Minnesota's Olmstead Plan. Secondary career and technical education programs provide appropriate accommodations and support for a competitive, integrated work environment through a variety of strategies targeted specifically at work-based learning (WBL) programs. These strategies will increase the quality of programs, enhance educator expertise, and capitalize on partnerships with other state agencies.
- Minnesota's first [alternative teacher preparation program](#), coordinated through Lakes Country Service Cooperative (LCSC), includes the Career and Technical Education Core program, Teacher Coordination of Work-Based Learning, Construction Careers, Transportation Careers, and Manufacturing Careers licensure programs.

Postsecondary

- The [Minnesota State Network for Educational Development](#) (NED) provides professional and educational development resources for all college and university educators, including college technical faculty, to promote and sustain academic excellence by providing relevant programs relating to classroom climate, content, teaching practices, equity, and assessment. Technical faculty can access these courses and workshops online at no cost. All courses are designed by faculty and staff for faculty and staff, cultivating a peer-to-peer learning community.
- Technical college faculty have access to on-site professional and educational development resources on their campus through a center for teaching and learning (CTL). Some CTLs offer mentoring through communities of practice based on discipline.
- [FY2023 Minnesota State System Office Workplan](#) supports and enhances the ability and capacity of campuses and the system to attract, retain, and develop a diverse and inclusive workforce able to meet the current and future educational needs more effectively.

- Continued partnership with the eight [Minnesota State Centers of Excellence](#), each serving a major industry that faces serious workforce challenges in IT, Healthcare, Manufacturing, Energy, Transportation, Agriculture, and Engineering.
- The [Minnesota State Office of Equity and Inclusion](#) supports all CTE leaders, staff, deans, and faculty by providing professional development in a wide range of equity topics that help leaders better understand the diverse range of students we serve.

By addressing these challenges and supporting the work of local Perkins consortia, Minnesota State and MDE collectively work towards attracting and retaining the best and brightest technical education professionals, ensuring that our students receive the best, most affordable, high-quality education available.

FISCAL RESPONSIBILITY

1) DESCRIBE THE CRITERIA AND PROCESS FOR HOW THE ELIGIBLE AGENCY WILL APPROVE ELIGIBLE RECIPIENTS FOR FUNDS UNDER THIS ACT, INCLUDING HOW—

- each eligible recipient will promote academic achievement;**
- each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and**
- each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations. (Section 122(d)(5) of Perkins V)**

A. EACH ELIGIBLE RECIPIENT WILL PROMOTE ACADEMIC ACHIEVEMENT;

Continuing Minnesota's consortium model, eligible recipients must offer Career and Technical Education (CTE) programs that include rigorous, coherent CTE content aligned with challenging academic standards. All approved state-recognized programs of study must include opportunities for both academic and technical skill attainment, which, ideally are integrated. The *State-recognized Program of Study Guide* includes the requirement that "course standards accurately align to the academic, technical, and employability skills learners must master for entry and success in a given career pathway." This articulates that the foundation of a program of study is the academic skills a student must have to enter and advance in career and/or college.

Academic skills as the foundation of a program of study is further emphasized in the Minnesota Department of Education's work on Career and College Readiness (CCR). In March 2016, MDE, in collaboration with the Regional Educational Laboratory (REL) Midwest and the Midwest Comprehensive Center (MSCC), brought together a group of educators and administrators to articulate what career and college readiness means for Minnesota students. Minnesota's vision of CCR is that a well-rounded view of education is needed to drive educational and workforce goals and policies. Taking many perspectives into consideration through feedback, the Minnesota CCR Work Group developed a holistic vision of career and college readiness:

A sufficiently prepared student is one who has the knowledge, skills, mindset, and experiences in the academic, workplace, and personal/social domains to keep learning and, beyond secondary school, to successfully navigate toward and adapt to an economically viable career.

Clearly, academic skills are at the very foundation of career and college readiness. CCR resources developed by MDE and distributed to secondary districts provide a comprehensive set of guidance, strategies, and tools for engaging districts and schools in equity-oriented CCR program planning and a continuous improvement process.

B. EACH ELIGIBLE RECIPIENT WILL PROMOTE SKILL ATTAINMENT, INCLUDING SKILL ATTAINMENT THAT LEADS TO A RECOGNIZED POSTSECONDARY CREDENTIAL; AND

Historically, reporting of technical skills assessment has been part of an intentional review process in Minnesota for more than a decade. The technical skill assessment project began with a pilot group of five programs of study completing a comprehensive review of foundational and academic knowledge, skills, and technical competencies needed to gain employment in selected careers. Through this collaborative process, secondary teachers, postsecondary faculty, business/industry experts validated the appropriate competencies, and technical skill assessments that would support these competencies. Minnesota continued the completion of this process of bringing the secondary and postsecondary teaching staff together with their business and industry partners twice to analyze each of the 72 career pathways. The review process continued to update and validate competencies and the identification of assessments with over 600 secondary teachers and 500 post-secondary faculty along with business and industry representatives participating. The TSA reports were an essential component of the Perkins IV work.

In the implementation of Perkins V, skill attainment remains a priority of the work. The documentation of skill attainment will continue to be an element required for designation as a state-recognized program of study and as an element of program review at secondary and postsecondary institutions. All state-recognized POS have a pathway leading to a recognized postsecondary credential. The definition of recognized postsecondary credential utilized is the WIOA definition. Under WIOA the term “recognized postsecondary credential” means a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree. In addition, Minnesota continues to validate the definitions of program quality and determine baseline data for CTE concentrators. The complete accountability system, secondary and postsecondary, monitors academic performance and completion rates including CTE subpopulations. Professional development and technical assistance are provided for consortia to develop and implement continuous improvement plans.

The state-recognized programs of study require an approved MDE CTE program and an approved Minnesota State program. An approved program must meet state requirements, including the academic and technical knowledge and skill components. In a similar fashion, a postsecondary approved diploma or associate degree award consists of general education and technical courses. The program approval process for both has elements of interaction with business and industry through the requirement of program advisory committees.

- C. EACH ELIGIBLE RECIPIENT WILL ENSURE THE LOCAL NEEDS ASSESSMENT UNDER SECTION 134 TAKES INTO CONSIDERATION LOCAL ECONOMIC AND EDUCATION NEEDS, INCLUDING, WHERE APPROPRIATE, IN-DEMAND INDUSTRY SECTORS AND OCCUPATIONS. (SECTION 122(D)(5) OF PERKINS V)

As part of a local application, consortia must include a comprehensive local needs assessment (CLNA) as per Perkins V requirements to be an eligible recipient of funds. All elements documented in Perkins V will be required: student performance; sufficient size, scope, and quality; progress toward programs and programs of study; recruitment, retention, and training of CTE professionals; and equity of access. The state's definition of size, scope, and quality, and alignment to labor market include parameters for the identification of high-skill, high-wage, and in-demand occupations. Both Minnesota's *Comprehensive Local Needs Assessment Guide* and the *CLNA Framework* provide guidance to ensure that local economic and education needs are taken into consideration. State leadership reviews the applications and has a dialogue with applicants to ensure section 122 is observed. On an ongoing basis, the consortium monitoring process reviews the evidence that the CLNA data and implemented actions took local economic and education needs into consideration.

State staff review research, consult with other states, and glean promising practices from the states' experience with WIOA and ESSA needs assessments to continuously improve the CLNA process and associated forms and guide to increase consortia success in gathering, analyzing, and implementing actions from the CLNA. Professional development regarding the form, guide, and process is offered in webinars and through technical assistance. The joint secondary and postsecondary applications submitted by consortia must provide performance targets and strategies for continuous improvement of academic achievement and technical skill attainment linked to comprehensive local needs assessment.

2) DESCRIBE HOW FUNDS RECEIVED BY THE ELIGIBLE AGENCY THROUGH THE ALLOTMENT MADE UNDER SECTION 111 OF THE ACT WILL BE DISTRIBUTED—

- A. AMONG CAREER AND TECHNICAL EDUCATION AT THE SECONDARY LEVEL, OR CAREER AND TECHNICAL EDUCATION AT THE POSTSECONDARY AND ADULT LEVEL, OR BOTH, INCLUDING HOW SUCH DISTRIBUTION WILL MOST EFFECTIVELY PROVIDE STUDENTS WITH THE SKILLS NEEDED TO SUCCEED IN THE WORKPLACE; AND

State Administration: 5%

Administration allocation is spent on activities related to developing the State Plan, reviewing applications, monitoring consortia, compliance oversight, and supporting fiscal and data systems required to implement Perkins V, etc.

State Leadership Activities: 10%

Leadership funds are split between the Minnesota Department of Education (42%) and Minnesota State (58%). From the postsecondary leadership funds, set-asides specified in Section 112(a)(2) of Perkins V are earmarked to serve individuals in state institutions, prepare individuals for non-traditional fields, and recruitment of special populations into CTE programs.

Distribution to Local Education Agencies (Consortia): 85%

In Minnesota, funds received by the eligible agency under section 111 will be allocated to local consortia according to the following allotments and calculations. These distribution methods are expected to provide the resources needed for student success in the workplace throughout the state, including the maximum of 15% in reserve funds to incentivize innovation and quality of programs of study. The reserve fund calculation will be split by formula to target both rural areas and applications serving high numbers of CTE students. Eighty-five percent of the funds received by the state will be distributed to local applicants through the basic and reserve funding allocations under Sections 131 and 132.

Basic funding: Eighty-five percent of the 85% distributed to local applicants will be distributed as basic funding, with secondary programs receiving 50% of the 85% and postsecondary receiving 50% of the 85%. The 50:50 split represents a philosophical commitment by Minnesota State and Minnesota Department of Education leadership to advancing equal opportunity and economic empowerment for both partners in the consortium.

Reserve funding: Fifteen percent of the 85% will be distributed to secondary and postsecondary programs on a 50:50 basis as reserve funding. These funds take into consideration “rural” and high numbers by adding the square mileage of the consortium part of the calculations. Allocation amounts to the whole consortium are based on a 50% sum of the area for member districts in the consortium area if/as the consortium has greater than 50 square miles of area served.

- B. AMONG ANY CONSORTIA THAT MAY BE FORMED AMONG SECONDARY SCHOOLS AND ELIGIBLE INSTITUTIONS, AND HOW FUNDS WILL BE DISTRIBUTED AMONG THE MEMBERS OF THE CONSORTIA, INCLUDING THE RATIONALE FOR SUCH DISTRIBUTION AND HOW IT WILL MOST EFFECTIVELY PROVIDE STUDENTS WITH THE SKILLS NEEDED TO SUCCEED IN THE WORKPLACE. (SECTION 122(D)(8) OF PERKINS V)

While consortia will submit a single application and receive an overall award, the calculations for the consortium will be based on:

Local Consortium Formula Allocation amounts:

Secondary formula:

- Most recent U. S. Census data for the population by school district of individuals aged 5- 17
- Most recent U. S. Census data for the population by school district of individuals aged 5- 17 in households of poverty
- Description (70% District population 5-17 in poverty/state population 5-17 in poverty times the total secondary formula amount) plus 30% district population 5-17/state population 5-17 times the total secondary formula amount for the state from the OCTAE allocation - 50% is calculated for each district. The secondary consortium formula = the sum of the amounts calculated for each district member of the consortium.

Postsecondary formula:

- Most recent data for CTE Postsecondary Pell Recipients
- Description (Pell recipients in the college in Perkins eligible programs/ Pell recipients in the state in Perkins eligible programs times the total postsecondary formula amount for the state from the OCTAE allocation - 50% is calculated for each college. The postsecondary consortium formula = the sum of the amounts calculated for each college member of the consortium.

For all calculations, the year representing “most recent” is consistent across all formulas.

- 3) DESCRIBE HOW THE ELIGIBLE AGENCY WILL ADJUST THE DATA USED TO MAKE THE ALLOCATIONS TO REFLECT ANY CHANGES IN SCHOOL DISTRICT BOUNDARIES THAT MAY HAVE OCCURRED SINCE THE POPULATION AND/OR ENROLLMENT DATA WAS COLLECTED, AND INCLUDE LOCAL EDUCATION AGENCIES WITHOUT GEOGRAPHICAL BOUNDARIES, SUCH AS CHARTER SCHOOLS AND SECONDARY SCHOOLS FUNDED BY THE BUREAU OF INDIAN EDUCATION. (SECTION 131(A)(3) OF PERKINS V)

When a school district changes boundaries, splits or merges, Minnesota revises formula populations as soon as the new population information is available. The process for a district or college changing to a new consortium is outlined in Section 4 of the [Minnesota Perkins V Operational Guide](#). Minnesota State partners with MDE to obtain any population data changes if school district boundaries change. Charter schools with approved CTE programs or secondary schools funded by the Bureau of Indian Education are incorporated into consortia.

4) IF THE ELIGIBLE AGENCY WILL SUBMIT AN APPLICATION FOR A WAIVER TO THE SECONDARY ALLOCATION FORMULA DESCRIBED IN SECTION 131(A)—

- A. INCLUDE A PROPOSAL FOR SUCH AN ALTERNATIVE FORMULA; AND
- B. DESCRIBE HOW THE WAIVER DEMONSTRATES THAT A PROPOSED ALTERNATIVE FORMULA MORE EFFECTIVELY TARGETS FUNDS ON THE BASIS OF POVERTY (AS DEFINED BY THE OFFICE OF MANAGEMENT AND BUDGET AND REVISED ANNUALLY IN ACCORDANCE WITH SECTION 673(2) OF THE COMMUNITY SERVICES BLOCK GRANT ACT (42 U.S.C. 9902(2)) TO LOCAL EDUCATIONAL AGENCIES WITH THE STATE. (SECTION 131(B) OF PERKINS V).

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

Minnesota will not be submitting a waiver to the secondary allocation formula.

5) IF THE ELIGIBLE AGENCY WILL SUBMIT AN APPLICATION FOR A WAIVER TO THE POSTSECONDARY ALLOCATION FORMULA DESCRIBED IN SECTION 132(A)—

- A. INCLUDE A PROPOSAL FOR SUCH AN ALTERNATIVE FORMULA; AND
- B. DESCRIBE HOW THE FORMULA DOES NOT RESULT IN A DISTRIBUTION OF FUNDS TO THE ELIGIBLE INSTITUTIONS OR CONSORTIA WITH THE STATE THAT HAVE THE HIGHEST NUMBERS OF ECONOMICALLY DISADVANTAGED INDIVIDUALS AND THAT AN ALTERNATIVE FORMULA WILL RESULT IN SUCH A DISTRIBUTION. (SECTION 132(B) OF PERKINS V).

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

Minnesota will not be submitting a waiver to the postsecondary allocation formula.

6) IF THE ELIGIBLE AGENCY WILL AWARD RESERVE FUNDS TO ELIGIBLE RECIPIENTS UNDER SECTION 112(C) OF PERKINS V, DESCRIBE THE PROCESS AND CRITERIA FOR AWARDED THOSE FUNDS.

Fifteen percent of the 85% distributed to local education agencies (consortia) is allocated for reserve funds. Minnesota apportions reserve funding to the whole consortium based on: a) 50%

on the sum of the area for member districts in the consortium/area for all districts in the state, b) 37.5% on the sum of secondary participants for member districts in the consortium/total secondary CTE participants in the state, and c) 12.5% on the sum of postsecondary participants for member districts in the consortium/total CTE postsecondary participants in the state based on the following data:

- School district area to account for certain district consolidations
- Most recent data for CTE Secondary participants
- Most recent data on Perkins CTE participants

State priorities will guide the use of reserve funding by consortia. Consortia are required to invest reserve funds in alignment with annually reviewed state priorities. The reserve fund priorities for FY25 [and FY26](#) are addressing performance gaps and developing or improving programs of study.

- 7) PROVIDE THE STATE'S FISCAL EFFORT PER STUDENT, OR AGGREGATE EXPENDITURES FOR THE STATE, THAT WILL ESTABLISH THE BASELINE FOR THE SECRETARY'S ANNUAL DETERMINATION ON WHETHER THE STATE HAS MAINTAINED ITS FISCAL EFFORT, AND INDICATE WHETHER THE BASELINE IS A CONTINUING LEVEL OR NEW LEVEL. IF THE BASELINE IS NEW, PLEASE PROVIDE THE FISCAL EFFORT PER STUDENT, OR AGGREGATE EXPENDITURES FOR THE STATE, FOR THE PRECEDING FISCAL YEAR. (SECTION 211(B)(1)(D) OF PERKINS V)

Using aggregate numbers of state support for CTE, which is calculated by excluding tuition revenue and allocating indirect expenses, the maintenance of effort for 2018 is equal to

\$124,944,120.00. Since the establishment of a baseline was a one-time MOE expenditure adjustment for the first year of Perkins V (7/1/19 to 6/30/20), there is no subsequent update to this information.

ACCOUNTABILITY FOR RESULTS

- 1) IDENTIFY AND INCLUDE AT LEAST ONE (1) OF THE FOLLOWING INDICATORS OF CAREER AND TECHNICAL EDUCATION PROGRAM QUALITY—
 - A. THE PERCENTAGE OF CTE CONCENTRATORS (SEE TEXT BOX 6 FOR THE STATUTORY DEFINITION OF A CTE CONCENTRATOR UNDER SECTION 3(12) OF PERKINS V) GRADUATING FROM HIGH SCHOOL HAVING ATTAINED A RECOGNIZED POSTSECONDARY CREDENTIAL;
 - B. THE PERCENTAGE OF CTE CONCENTRATORS GRADUATING HIGH SCHOOL HAVING ATTAINED POSTSECONDARY CREDITS IN RELEVANT CAREER AND TECHNICAL EDUCATION PROGRAMS AND PROGRAMS OF STUDY EARNED THROUGH A DUAL OR CONCURRENT ENROLLMENT PROGRAM OR ANOTHER CREDIT TRANSFER AGREEMENT; AND/OR
 - C. THE PERCENTAGE OF CTE CONCENTRATORS GRADUATING FROM HIGH SCHOOL HAVING PARTICIPATED IN WORK-BASED LEARNING. (SECTION 113(B)(2)(A)(IV)(I) OF PERKINS V)

Include any other measure(s) of student success in career and technical education that are statewide, valid, reliable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins V) Please note that inclusion of “other” program quality measure(s) is optional for States.

Provide the eligible agency’s measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

During May 2019, the Perkins V Secondary Accountability: Technical Advising Committee convened for three in-person meetings to discuss key questions and decision points around the updated legislation. This group represented a variety of secondary perspectives. Options for performance indicators and data sources were shared with the advisory group, who then discussed the issues and provided recommendations to MDE. The advisory group also provided recommendations for future work such as improving secondary, postsecondary, and business and industry partnerships so that additional industry-recognized credentials could be identified and implemented. This would enhance the connection between Perkins V and WIOA and provide more ‘Career Ready’ opportunities for students.

Once the full scope of the accountability system and methodology for determining levels of performance were finalized, the previous recommendations made by the advisory group were then further analyzed by state leadership. Based on data review, state-level priorities, and the additional feedback survey information collected from members of the original secondary

advisory group as well as secondary consortium leaders, and in consultation with state leadership, it was determined that the optional other program quality indicator (5S4) identified as the technical skill attainment and/or industry-recognized credential should not be included in the secondary accountability system. The final decision was to include (5S3) Program Quality: Work-Based Learning, definition as follows:

Numerator: Number of CTE Concentrators who successfully completed one or more work-based learning courses prior to graduation.

Denominator: Number of CTE Concentrators who graduated high school.

- 2) PROVIDE ON THE FORM IN SECTION V.B, FOR EACH YEAR COVERED BY THE STATE PLAN BEGINNING IN PROGRAM YEAR (PY) 2020-21, STATE DETERMINED PERFORMANCE LEVELS FOR EACH OF THE SECONDARY AND POSTSECONDARY CORE INDICATORS, WITH THE LEVELS OF PERFORMANCE BEING THE SAME FOR ALL CTE CONCENTRATORS IN THE STATE. (SECTION 113(B)(3)(A)(I)(I) OF PERKINS V)

State Determined Performance Levels (SDPL) Form

State Name: Minnesota

SECONDARY INDICATORS	BASELINE LEVEL, 2020	Performance Levels by Program Year						
		2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27
1S1: Graduation Rate (four-year)	92.21%	54.95%	54.99%	55.08%	55.26%	92.70%	93.32%	94.20%
2S1: Academic Proficiency: Reading/Language Arts	0.00%*	11.27%	11.33%	11.45%	11.68%	53.09%	50.77%	50.38%
2S2: Academic Proficiency: Mathematics	0.00%*	9.08%	9.11%	9.17%	9.29%	36.47%	34.72%	33.24%
2S3: Academic Proficiency: Science	41.83	**	**	**	**	41.84	42.14%	34.31%
3S1: Post-Program Placement	65.70%	48.43%	48.49%	48.61%	48.84%	55.06%	58.42%	64.83%
4S1: Nontraditional Program Concentration	36.31%	9.44%	9.49%	9.59%	9.79%	28.15%	28.39%	30.17%
5S3: Program Quality: Work-Based Learning	13.08%	4.33%	4.34%	4.37%	4.41%	13.19%	15.04%	17.88%

*NOTE: Due to the COVID-19 peacetime emergency, MCA (Minnesota Comprehensive Assessment) testing was canceled, therefore, no Reading or Mathematics academic achievement data are available during SY2019-20.

**As explained in the text, Minnesota did not set a 2S3 SDPL for grant years 1-4.

		Performance Levels by Program Year						
POSTSECONDARY INDICATORS	BASELINE LEVEL, 2020	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27
1P1: Postsecondary Retention and Placement	90.77%	91.12%	81.98%	81.98%	81.98%	91.03%	92.22%	92.34%
2P1: Earned Recognized Postsecondary Credential	50.68%	50.60%	45.58%	45.58%	45.58%	53.01%	54.59%	55.11%
3P1: Nontraditional Program Enrollment	13.98%	14.00%	12.54%	12.54%	12.54%	17.37%	17.59%	18.46%

3) DESCRIBE THE PROCEDURE THE ELIGIBLE AGENCY ADOPTED FOR DETERMINING STATE-DETERMINED LEVELS OF PERFORMANCE DESCRIBED IN SECTION 113 OF PERKINS V, WHICH AT A MINIMUM SHALL INCLUDE—

- A. DESCRIPTION OF THE PROCESS FOR PUBLIC COMMENT UNDER SECTION 113(B)(3)(B) OF PERKINS V AS PART OF THE DEVELOPMENT OF THE STATE-DETERMINED LEVELS OF PERFORMANCE (SEE TEXT BOX 7 FOR THE STATUTORY REQUIREMENTS FOR CONSULTATION ON STATE-DETERMINED PERFORMANCE LEVELS UNDER SECTION 113(B)(3)(B) OF PERKINS V);
- B. AN EXPLANATION FOR THE STATE-DETERMINED LEVELS OF PERFORMANCE THAT MEET EACH OF THE STATUTORY REQUIREMENTS IN TEXT BOX 8; AND
- C. A DESCRIPTION OF HOW THE STATE-DETERMINED LEVELS OF PERFORMANCE SET BY THE ELIGIBLE AGENCY ALIGN WITH THE LEVELS, GOALS AND OBJECTIVES OTHER FEDERAL AND STATE LAWS, (SECTION 122(D)(10) OF PERKINS V).

As part of the procedures for determining State-determined levels of performance, describe the process that will be used to establish a baseline for those levels.

For the original Minnesota Perkins V plan (2020), multiple statistical approaches were reviewed to establish state and local performance levels, including the statistical adjustment model used for the WIOA Performance Accountability System, trend extrapolation, and statistically significant increases using simulated historical data. After consultation with representatives from consortia, stakeholders, and regional partners, it was determined that the most

appropriate approach for Minnesota was to set the proposed state performance level for each accountability indicator using a factor of the standard deviation of simulated historical data. This procedure allows for the determination of what level would constitute “meaningful progress” for each indicator, establishing statistically significant improvement relative to the baseline by the fourth year of the plan.

At both the secondary and postsecondary levels, simulated historical accountability datasets were created using specifications and definitions per the *Strengthening Career and Technical Education for the 21st Century Act*. These data were used to set the baseline year (the most recent year for which accountability results were available). Then, a conservative rate of growth (i.e., slower growth during the first two years, followed by more aggressive growth during the final two years) was applied to determine the annual performance levels. A conservative growth rate was adopted for the first two years in recognition that programs and strategies implemented under Perkins V would require some lead-time before the full impact on rates would be observed, but at the same time the methodology incorporates continuous improvement each year.

The same overall methodology was used to determine state performance levels for both secondary and postsecondary indicators, with the following exceptions:

- The number of historical years of data that were available varied by indicator, with some indicators having as few as two years of historical data available, but most indicators having five or six years of historical data; and
- The factor of the standard deviation used differed for some of the indicators.

Although using the standard deviation of simulated historical data was the best approach identified, we also recognized some caveats associated with the methodology. Those caveats, along with other external factors that could impact indicators and result in potential amendments to performance levels, were noted:

- Simulated historical data for some indicators were limited to only two or three years due to substantial changes in the data over time or unavailability of historical data going back more than a couple of years. The factor of the standard deviation was adjusted to account for the limitation. However, once additional years of data are observed, there may be evidence that the standard deviation of the simulated historical data was substantially different (higher or lower) than what would have been derived with additional data points.
- We may find the methodology needs modification even for indicators where six years of simulated historical data were available. Statistically, even six observations is a small number and may yield an over- or under- estimate of average random variation. After the first two years, we may need to adjust the factor of standard deviations such that it more accurately reflects the observed random variance. Given that we anticipate lower programmatic impact in the first two years of the plan due to the time it takes to realize change, we would use those data to reassess the random variance and request adjustments accordingly.

- This methodology presumes conservative growth in the first two years with more aggressive growth in the final two years of the plan. As such, we assumed a doubling of improvement each year of the plan. These presumptions were based on a logical understanding of the process implementing new initiatives, but the actual numeric weights for the annual change were an educated guess. As we move forward with data collection, differences in observed speed of improvement may necessitate performance level adjustments.
- This methodology presumes the make-up of students in the denominator (CTE concentrators) and economic conditions will remain relatively constant over the next four years. Any substantial changes to either of these things may necessitate an adjustment of performance levels.
- Changes in core elements driving an indicator, such as changes to the Minnesota standards in reading/language arts, mathematics standards, updates to the Minnesota Comprehensive Assessment (MCA) tools, or changes in the employment market would likely impact performance levels.
- Other changes to data collection, data quality, or data availability could also substantiate requests to adjust performance levels.

Minnesota does meet the statutory requirements specified for the state-determined performance levels. The performance levels are specified as percentages for each secondary and postsecondary core indicator and the levels require meaningful progress toward improving the performance of all CTE concentrators over the grant timeframe. The state performance levels were subject to the public comment process and responses to the comments are included in section D4.

Regarding the extent to which the state-determined levels of performance advance the eligible agency's goals, as set forth in the state plan (3a) and how the SDPLs align with levels, goals, and objectives of other federal and state laws, 1P1 is a similar, but broader measure of placement of program completers in WIOA. The Perkins V indicator includes both employment placement and continuing postsecondary education and other parameters we are currently unable to capture – military, peace corps, advanced training, etc. Indicator 2P1 is a measure of completion as Minnesota has defined it, which aligns with the WIOA completion measure and is related to state credential attainment goals.

[Note to reader: The following information documents the procedure for determining SDPLs for the 2024 (and later) Minnesota Perkins V State Plan Annual RevisionRevisions. Although Minnesota elected to submit an annual revision to the original Four-Year State Plan, SDPLs were established for the next four program or fiscal years (2024-2027). The SDPLs Minnesota established for grant years 6 through 8 will be implemented so long as they meet the requirements of Section 113(b)(3)(A)(i)(III)(ee).] 1/5/2026 Update: New SDPLs for grant year 7 were determined and included in the table on pages 70-71. As of this date they have not yet been subject to the public comment process.]

3a. a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State-determined levels of performance (see Text Box 7 for the

statutory requirements for consultation on State-determined performance levels under section 113(b)(3)(B) of Perkins V);

SDPL Engagement and Input Opportunities for Key Partners

Minnesota State Research staff held a webinar with a subset of college institutional research directors engaged in CTE reporting at their postsecondary institutions on October 20, 2023. In this webinar, Research staff presented more detailed information about the data reviewed to inform the proposed postsecondary state-determined performance levels for grant years 5 through 8, provided information about the specific methodology used to set each postsecondary SDPL, and asked attendees to provide feedback on the SDPLs through an online form through November 9, 2023. In total, 15 people attended the webinar (including state staff) and none of the attendees provided feedback or asked questions during the webinar. On October 23, 2023, a reminder email was sent to college institutional research directors reminding them of the opportunity to access the recording of the webinar and to provide feedback in the online form through November 9, 2023. Zero responses were received to the questions in the online form.

Minnesota State and MDE Research staff held an in-person meeting with Minnesota Consortium Leaders at the Annual Perkins Leaders Fall Meeting on October 31, 2023 to collect input on the proposed postsecondary state-determined performance levels for grant years 5 through 8. During this meeting, Research staff presented more detailed information about the data reviewed to inform the proposed state-determined performance levels for grant years 5 through 8, provided information about the specific methodology used to set each SDPL, and asked attendees to provide feedback on the SDPLs on posters hanging up in the meeting room. Attendees were asked to provide input on each SDPL using the acronym M(MINT)O:

Meaningful - *Does the proposed SDPL for this indicator meet the requirement for “meaningful improvement”? Why or why not?*

Methodology - *Does the methodology for this indicator seem reasonable and meet the requirement for “meaningful improvement”? Why or why not?*

Initiatives - *What additional system, local, statewide, or regional initiatives could impact performance on this indicator?*

New Changes - *What significant changes to programs, interventions, data collection, or any other missing context or information could impact performance on this indicator?*

Trends - *What regional workforce trends or new or ending partnerships could impact performance on this indicator?*

Other - *Share any additional input you would like to provide about the SDPL process or proposed SDPLs for this indicator.*

A total of 34 comments on the proposed secondary SDPLs and 15 comments on the proposed postsecondary SDPLs were provided by attendees, including state staff. Attendees and state program staff were also given the opportunity to provide input through an online form through

November 21, 2023. An email reminder inviting Perkins leaders to provide feedback through the online form through November 21, 2023, was sent on November 9, 2023, to all Perkins leaders. Zero responses to the proposed postsecondary SDPLs were submitted through the online form.

After carefully reviewing all 15 comments received on the postsecondary SDPLs, the decision was made to not make any changes to the proposed SDPLs based on the input provided at the in-person meeting. However, postsecondary did acknowledge that some of the input expressed concern or recommended changes to the legislative definitions of the measures. In a follow-up email on December 13, 2023, it was communicated to Perkins consortium leaders that the state is not allowed to change legislative definitions of the measures but would note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level. The email also provided additional clarification on a few misunderstandings regarding the core indicator and SDPL data that were identified in the comments.

Following the consideration of the comments received during the Annual Perkins Leaders Fall Meeting on October 31, 2023; the proposed SDPL information was shared forward within the Minnesota Department of Education agency to key leaders in data analytics and executive team members. No further changes were recommended.

SDPL Public Comment Process

The public comment requirement for determining the program year 2025-2028 SDPLs was combined with the 2024 State Plan public comment process. See “3. Describe opportunities for the public to comment in person and in writing on the State plan” section for details on the process.

3b. an explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8 (Section 113(b)(3)(A)(i)(III) of Perkins V); and Text Box 8: Statutory Requirements for State Determined Performance Levels (Section 113(b)(3)(A)(i)(III) of Perkins V)

Calculating SDPLs and Baseline Percentages

Each SDPL is expressed as a percentage based on dividing the numerator for each indicator by the denominator for each indicator and multiplying this by 100.

For determining state determined levels of performance for Minnesota’s 2024 State Plan Annual Revision under Perkins V, Minnesota was instructed by the Office of Career, Technical and Adult Education (OCTAE) to follow section 113(b)(3)(A)(i)(III)(ee) of Perkins V legislation, which interprets the establishment of SDPLs as allowable adjustments under Section 113(b)(3)(A)(i)(III) clause(ii). Section 113(b)(3)(A)(i)(III)(ee) of Perkins V states SDPLs shall, **when being adjusted pursuant to clause (ii)**, be higher than the average actual performance of the two most recently completed program years.

Minnesota calculated the average actual performance of the two most recently completed program years for each secondary and postsecondary indicator by summing the percentage value of the actual performance in program year 2022 and program year 2023 and dividing this by two for each indicator to express the average actual performance as a percentage. This calculated average served as the baseline from which SDPLs were set for grant years 5 through 8 (i.e., program years 2025-2028).

On April 11, 2024, the Office of Career, Technical and Adult Education (OCTAE) provided new guidance that required Minnesota to set state determined levels of performance (SDPLs) higher than the average actual performance of the 2 most recently completed program years **for each grant year** beyond the original 4-year State Plan. Therefore, the SDPLs Minnesota established for grant years 6 through 8 will be implemented so long as they meet the requirements of Section 113(b)(3)(A)(i)(III)(ee). However, if the established SDPLs for grant years 6 through 8 do not meet the requirements of Section 113(b)(3)(A)(i)(III)(ee) or if qualifying unanticipated circumstances arise, Minnesota will need to adjust the SDPLs for grant years 6 through 8.

Meaningful Progress on Performance

At the September 27, 2023, Perkins V Collaborative Convening meeting, the Office of Career, Technical and Adult Education (OCTAE) indicated that while there is not an official legislative definition for "continuous meaningful progress," SDPLs for indicators cannot remain flat from year to year. However, OCTAE acknowledged that for indicators for which performance is already at a high rate (e.g., 94%), increases from year to year may be minimal compared to indicators where actual performance is not approaching a ceiling and there is more room for annual growth.

At both secondary and postsecondary levels, Minnesota applied a conservative growth model, either based on a statistical model or standard deviation(s) of change over time, depending on historical performance on the indicator. The methodology was applied over grant years 5 through 8, starting with the average of the actual performance of the two most recently completed years as the baseline. Minnesota also reviewed additional data to assist in providing context on determining the SDPLs. More detailed explanations of the information that was taken into consideration in determining SDPLs for each postsecondary and secondary indicator are provided below.

Determining Secondary SDPLs

Several methodologies were explored for determining secondary SDPLs for grant years 5 through 8, including both a linear probability model (slope of historical data) and a standard deviation model (which was used to set SDPLs for the previous state plan). Standard deviations (SD), or a fraction of an SD, were implemented for each performance indicator based on model fit. Multiple models were considered in terms of how to distribute continuous improvement increases across the years of the grant. Ultimately, a linear model based on historical trends, with equally apportioned increases each year provided the best fit and met the greatest number of established criteria.

1S1: Four-Year Graduation Rate – Based on this modeling process, our most assertive SDPLs were proposed for this indicator in order to achieve one standard deviation of growth across grant years 5 through 8. Although our performance outcomes are already high and therefore growth is more challenging to realize, based on a review of the national Perkins Collaborative Research Network (PCRN) data, it was determined that there is still potential for further improvement. Additionally, in reviewing local data trends for this indicator, it was discovered that the numerator is in fact growing, a higher number of CTE concentrators are indeed graduating in comparison with prior years—however, it is also the case that the denominator is currently out-pacing the growth of the numerator as more high school students become CTE concentrators in pursuit of learning marketable skills. We hope to address this growth challenge in the coming grant years and also ameliorate any remaining student group gaps.

2S1 and 2S2: Academic Proficiency – Declining outcomes for our academic achievement performance indicators have continued to persist post COVID-19 for both reading/English language arts and mathematics, as do the existing performance gaps for disaggregated student groups. This will be a priority for secondary education in the coming grant years; however, we do not know yet what to expect in terms of the potential rate of growth. Given the amount of focus needed and the level of ongoing uncertainty surrounding these performance measures, we have chosen to propose very conservative SDPLs.

2S3: Academic Proficiency (Science) -- Minnesota did not set performance targets for 2S3, Academic Proficiency in Science, during the transition year to Perkins V or in the 4 years following that within the scope of the 4-year State Plan. The reason for this is because Minnesota has not historically offered testing for academic achievement in Science in a consistent manner throughout the state. Although the assessment is standardized, the grade in which students complete the assessment is not. Students sit for the science assessment in either 9th or 10th grade depending upon when they complete the Life Sciences requirements in their school districts. With this revision to the Minnesota State Perkins Plan, OCTAE will no longer allow for this exception. Following consultation with OCTAE staff, the decision was made to set an SDPL for 2S3 based on the previous year's statewide data from the science assessment. A separate public comment period was held for the proposed 2S3 SDPL and comments from that are included in section D4 below.

3S1: Post-Program Placement – Additional circumstances which may have unknown future impact include estimates in the birthrate/demographic cliff. The current school year 2023 saw the highest number of twelfth-grade students that we will have had the opportunity to educate. Following the current year, we anticipate the number of twelfth-grade students to decline by approximately five thousand students, followed by a slight increase during grant year 2024-25, after which point the population of twelfth-grade students begins to decline sharply, particularly during the last two years of the new state plan, and does not appear to recover during the foreseeable future. In fact, this general pattern of declining enrollment holds true across all high school grades nine through twelve. In terms of enrollment and

engagement with CTE programming, our percentages are remarkably consistent despite fluctuations in the overall general population; therefore, we remain hopeful that the impact on CTE enrollment will be minimal. However, there may be unknown impacts to some performance indicators more than others. For example, postsecondary enrollment has been decreasing across the last few years, most specifically for two-year enrollment and with a declining population on the horizon, this makes the need to be intentional even greater and the opportunity to grow ever more challenging. There are initiatives in place that we hope will assist in recruiting and retaining postsecondary enrollment and employment; even so, the potential for continuous improvement remains unknown. Given this, we are proposing the most conservative estimates possible for this indicator.

4S1: Nontraditional Completion – Based on current data and future population estimates, Minnesota is already performing at a high rate for this indicator and our potential for improvement, based on our currently assigned CIP codes and ratio of programs, is minimal. Given this, we are proposing conservative estimates for this indicator.

5S3: Program Quality: Work-Based Learning – Although this performance indicator is closely tied to local economic opportunities and therefore deserves caution, we have experienced our highest post-COVID-19 rebound in student outcomes for this indicator. Further, growth and continuous improvement have been realized across all disaggregated student groups. Though there may be potential impacts due to the birthrate/demographic cliff previously discussed, we remain cautiously optimistic and are therefore proposing one standard deviation of growth across the four years of the new state plan.

In addition to the birthrate/demographic cliff, there are other local initiatives that may have both positive and negative impacts on our CTE concentrator population. For example, many dual-enrollment initiatives encourage students to complete college-level courses while still in high school that may result in unintentional consequences including competition for course time thus decreasing the opportunity to become a CTE concentrator. This may have a negative impact across all performance indicators, or this could create the possibility for students to finish a degree prior to high school graduation, thus not needing to enroll in a post-secondary program which may mean further decreases in 3S1: Post-Program Placement.

Even so, there are many other initiatives which we hope will off-set any negative impacts to performance outcomes, such as the possibility of including CTE concentrators into the ESSA system thus highlighting the value of CTE programming, personal finance courses will now be required for graduation thus potentially increasing the CTE concentrator population and interest in certain programs of study, the Computer Science Education Advancement program may assist in attracting students to our CTE career pathways, and further, CTSO grants, as well as additional funding for teacher recruitment and retention, could all play a vital role in assisting our programs, teachers, and students toward their continuous improvement goals. Although uncertainty and many future unknowns persist, sharing the

results of the data review process with our secondary consortium leaders as well as leadership at the Minnesota Department of Education has provided us with insights into where the strengths and challenges exist such that we are now well-positioned to focus our efforts where needed most and celebrate good work where accomplishments have been realized while continuing to implement our continuous improvement strategies.

Determining Postsecondary SDPLs

Several methodologies were explored for determining postsecondary SDPLs for grant years 5 through 8, including the same methodology that was explored for setting SDPLs for the original state plan (two standard deviations of growth applied through a conservative, aggressive, s-shaped or linear approach over four years), a linear probability model, and a moving average using ARIMA (autoregressive integrated moving average) model.

After exploring these methodologies, it was determined that a model with conservative linear growth over four years would be most suitable for establishing “meaningful progress” for each indicator, with the future forecast informed by the historical performance on Minnesota’s postsecondary indicators, which have overall shown slow, steady growth. However, there are at least a couple of upcoming circumstances that may impact both Minnesota’s CTE enrollment and student outcomes in unknown ways. This includes impending decreases in the college age demographic, referred to as the “demographic cliff” in higher education, while at the same time an implementation of Minnesota’s new North Star Promise last-dollar scholarship (a.k.a. free tuition) program. It’s unclear how the combination of these two things will impact general enrollment in higher education in Minnesota’s public higher education institutions, but even more specifically what the impact will be on CTE program enrollment and performance. Therefore, a conservative approach was used to establish SDPLs. For each of the three core indicators, the SDPLs for grant years 5 through 8 were established using the slope of the regression line of both pre-Perkins V and Perkins V data (i.e., linear probability model). The baseline/starting point was the average of the two most recent years of performance (i.e., the average of performance from grant years 2 and 3). Additional considerations for each postsecondary indicator are also highlighted below.

1P1 – During recent work related to a merger of colleges in our system, we found an error in the code that generates the numerator for this indicator across all institutions, so we anticipate slightly higher performance rates because of finding and resolving that error, which was undercounting students who were continuing their education at the same institution from which they graduated. In fact, Minnesota already showed slightly higher performance rates for 2023 due to the correction.

2P1 – Minnesota State has several ongoing initiatives that could impact performance on this indicator, but these initiatives will take time to produce the desired results. In addition to initiatives specific to CTE/Perkins, there has long been a systemwide focus on increasing credential attainment. This started even before the 2015 Minnesota Legislature enacted

legislation setting a target that 70% of MN adults aged 25-44 will attain a postsecondary certificate or degree by 2025. In addition, several system-supported initiatives likely influence/will continue to impact credential completion, including:

- reverse transfer,
- UAchieve schedule and graduation planner,
- Math pathways and course placement adjustments, and
- implementation of proactive advising solutions such as Starfish or Navigate.

In June 2019, Minnesota State implemented Equity 2030 and set goals to reduce equity gaps in completion rates by 2030; the system and system institutions continue devoting resources to Equity 2030 work and improving completion rates for underrepresented students. More related to CTE programs, in Fall 2018, the Minnesota State Legislature started funding Workforce Development Scholarships for students. This program provides scholarships to students in high-demand educational programs that lead to employment in industries that overlap significantly with CTE programs, and the funding is time-limited, which may help promote more timely program completion among recipients. Finally, the new North Star Promise program begins in the 2024-25 school year, which is a last dollar scholarship that will be available to Minnesota residents who have a family adjusted gross income (AGI) below \$80,000 and attend a Minnesota public higher education institution. At this time, it's unclear how this new scholarship program will specifically impact CTE program enrollment and completion rates.

3P1 - In September 2023, Minnesota State applied the 2020 Nontraditional Occupations Crosswalk to state program data, with the impact being on grant year 4 forward. The update to the nontraditional designations resulted in improvement on the state's performance on this indicator by several percentage points for grant year 4/reporting year 2024 when performance rates were compared pre- and post-implementation. However, it's also important to note that grant year 4 data are still in-progress, so the final impact of this change remains to be seen. To account for improved performance observed so far, Minnesota added 2.5% to the 14.65% calculated minimum baseline (i.e., the average of the performance on 3p1 from grant years 2 and 3) to get a new baseline of 17.15%. This 2.5% increase was calculated by adjusting the average numerator from the two years used in establishing the baseline, along with the average denominator from the same period, to reflect the net change observed in both numerator and denominator for grant year 4/reporting year 2024, following the application of the 2020 Nontraditional Occupations Crosswalk. The new baseline was used as the starting point for establishing state SDPLs for grant years 5-8.

3c. a description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

Comparing Minnesota's SDPLs to Other States

In establishing the secondary and postsecondary SDPLs for grant years 5 through 8, Minnesota took into account how its SDPLs and performance on the indicators compares to SDPLs of other states. More detailed explanations of this state-to-state comparison, as well as additional comparisons, are provided below, first for secondary SDPLs and then for postsecondary SDPLs.

Secondary SDPL Comparisons

To inform the process of establishing secondary SDPLs for program years 2025-2028, Minnesota reviewed:

- MN trend performance data (modeled historical data and Perkins V).
- Enrollment data, both current students in the system as well as projected future high school enrollment based on current grade school enrollment trends. These data were leveraged to anticipate when the 'birthrate cliff/demographic cliff' would begin to have potential impacts on high school CTE initiatives and programming.
- Enrollment trends for both CTE participants & concentrators.
- Trends in achievement data
- Existing performance gaps, by disaggregated student groups.
- No recent attendance data were available for review due to COVID-19 disruptions in prior years.
- Perkins Collaborative Research Network (PCRN) performance rates and SDPLs from Year 1 and Year 2 for other states implementing similar performance indicator definitions, processes, and assessment where assessment information was provided; range of performance and ranking of Minnesota's outcomes in comparison with similar states and territories, as well as increases and decreases in performance across the two years of data where available. A different grouping of states emerged from the analysis of each performance indicator. The data available on the PCRN tool was very helpful and informative in the process of determining where we could potentially challenge ourselves and where Minnesota is already excelling.
- Reviewed multiple methodological options for determining SDPLs in the context of statistical soundness, current and future educational contexts, population forecasting, predetermined criteria for each performance indicator, as well as discussion and feedback from secondary consortium leaders.

Postsecondary SDPL Comparisons

To inform the process of establishing postsecondary SDPLs for program years 2025-2028, Minnesota reviewed:

- Performance rates and SDPLs from Year 1 for other states in our ACTE region III (Iowa, Illinois, Indiana, Minnesota, Missouri and Wisconsin); range of performance and SDPLs for each indicator for all 53 states and territories and where Minnesota fell in the range.
- Year 3 SDPLs from states with similar Perkins grant funding levels as MN (\$20-\$29M) from the September 27, 2023 Perkins Collaborative Convening.
- Minnesota State enrollment and completion data, specifically at system two-year institutions.
- Perkins participant and concentrator enrollment, indicator performance trend data, and general CTE enrollment/program completion data.
- Several methodologies for setting targets.

- Several methodologies for establishing local (consortium) targets after the state performance targets are established.
- Through the process of comparing both Minnesota’s indicator SDPLs and actual performance with the state levels of performance and actual performance for other states, none of the differences observed suggested Minnesota’s proposed SDPLs or methodology were inadequate or extreme. Where differences were observed, further exploration suggested the differences are likely due to the fact Minnesota uses a three-year cohort model for measuring accountability performance and many other states do not, or differences in the way the metrics were operationalized/defined.

SDPL Alignment with Federal and State Goals

As one of the few states submitting a WIOA Combined State Plan, Minnesota has taken a coordinated, unified approach to workforce development. The governor has proposed a “One Minnesota Plan” with a mission to improve the lives of all Minnesotans by working collaboratively to implement policies that achieve results benefitting all citizens. A key priority is for state agencies and community partners to collaborate to achieve common goals. We are doing that in Minnesota and submitting this revised Perkins State Plan as part of the Combined WIOA State Plan is a testament to that effort. Note the WIOA State Plan Goals for 2024-2027 and how they mirror Perkins V goals in many ways:

- Increase interagency coordination and alignment around shared goals, maximizing efficiency and coordination of workforce funding and programs and improving system integration, and creating a “no-wrong-door” approach for individuals or employers engaging in the workforce system.
- Build employer-led industry sector partnerships across the state to create or expand responsive and equitable workforce development programs and career pathways with embedded work-based learning or on-the-job training, including Registered Apprenticeships, focused on closing gaps in participation and representation based on race, ethnicity, disability, gender, veteran status, and age.
- Create a more inclusive, equitable, accessible, and proactive workforce system to serve all Minnesotans, preparing employers and the current and emerging workforce for the changing nature of work including new and emerging technology, changing labor market demand, and for the state’s shifting demographics, including our new Minnesotans.

Perkins V goals include many of the same priorities, including interagency coordination and alignment around shared goals which is evident in our secondary/postsecondary partnerships throughout the state to promote CTE programs of study. Indeed, the partnership between Minnesota Department of Education and Minnesota State to bring secondary and postsecondary career and technical education programs and programs of study together is a perfect example of this.

Perkins V is deeply rooted in partnerships between business/industry and education through work-based learning opportunities provided for students, which is so important that Minnesota has chosen Work-based learning (5S3) as our Perkins quality indicator. As described earlier in this plan, Minnesota State has set a critical goal of eliminating the educational equity gaps at every Minnesota State college and university by 2030. This audacious goal requires systems and culture change, innovation, advocacy and leadership, and partners across the state to accomplish. All of this is

supported by Perkins V, with its focus on reducing performance gaps for students, especially those who are members of special populations. Finally, through these various programs in the state, we are all working together for the same goal of meeting workforce needs of the present and the future.

4) PROVIDE A WRITTEN RESPONSE TO THE COMMENTS REGARDING STATE DETERMINED PERFORMANCE LEVELS RECEIVED DURING THE PUBLIC COMMENT PERIOD PURSUANT TO SECTION 113(B)(3)(B) OF PERKINS V. (SECTION 113(B)(3)(B)(III) OF PERKINS V)

As part of the written response, include a description of any changes made to the State determined performance levels as a result of stakeholder feedback.

The SDPL public comment process for the original Minnesota Perkins V Four-Year Plan was documented in the *Minnesota Perkins V Public Comment Report*, February 10, 2020. The public comment period for the program year 2025-2028 SDPLs was completed along with the 2024 Minnesota State Plan Annual Revision public comment held December 8, 2023 through January 7, 2024, for a period no less than 30 days in length. (Note: Following these comments, see the information on the separate public comment period for the 2S3 SDPL).

18 total comments were received over the 30-day period for the three proposed questions. Details about each comment are displayed in the table below along with the response from MDE and/or Minnesota state staff.

Do the proposed state performance levels meet the requirements of the law?	
Feedback via Public Comment Process	State Response
Start time: 12/8/2023 3:25:51 PM; End time: 12/8/2023 3:38:49 PM; Director of Enrollment at Minnesota State Tech College "Yes."	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 12/8/2023 5:04:12 PM; End Time: 12/8/2023 5:30:22 PM; Teacher (K-12) "Knowing the COVID kids coming up, we are going to have a hard time meeting these performance levels. The level of apathy and	Thank you for your input. Minnesota Department of Education has a number of initiatives and opportunities in place to provide support for new CTE Teachers, as well as professional development opportunities for experienced CTE teachers. We hope these training opportunities will provide you with the support and assistance needed. We look

lack of parental support have never been worse and I have been teaching for 33 years.”	forward to partnering with you in meeting the needs of all secondary CTE students.
Start time: 12/20/2023 8:33:10 AM; End Time: 12/20/2023 12:08:20 PM; School leader (College Administrators, Secondary Administrators, etc.) “4S1 focuses on non-trad (gender). Nontrad seems outdated as WIOA pulled it from their outcomes over 10 years ago. The focus is all on Performance Gaps and Special Populations. Should this indicator measure # of Spec Pops instead of non-trad?”	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level. Special Populations data are reported for every secondary and postsecondary performance indicator. Consortia, districts, and colleges are highly encouraged to review these data for local decision-making and strategic implementation purposes.
Start time: 12/20/2023 2:21:41 PM; End Time: 12/21/2023 9:10:59 AM; School leader (College Administrators, Secondary Administrators, etc.); “I believe so.”	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 12/21/2023 1:06:29 PM; End Time: 12/21/2023 1:13:13 PM; Parent (Guardian);Teacher (K-12); “As mentioned previously, 3P1 and 3S1 are referring to non-trad which is outdated. This indicator should measure all special pops.”	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level. Special Populations data are reported for every secondary and postsecondary performance indicator. Consortia, districts, and colleges are highly encouraged to review these data for local decision-making and strategic implementation purposes.
Start time: 1/2/2024 12:42:34 PM; End Time: 1/2/2024 1:03:34 PM; School leader (College Administrators, Secondary Administrators, etc.); “Yes”	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.

Start time: 1/7/2024 4:00:35 PM; End Time: 1/7/2024 4:23:29 PM; Faculty (College and University);School leader (College Administrators, Secondary Administrators, etc.); "These SDPLs are not wrong-headed but they all suffer from the "fox watching the henhouse" problem. For instance, in my university, we could increase our pass rates and graduation rates by inflating GPAs and course grades while ignoring each student's true performance (or lack of performance). Or we could ensure that our students perform well on standardized tests by teaching to the test and ignoring the finer points and principles of ethics, justice, and constitutional requirements. Or we could allow all law enforcement students to continue in the program (just as nursing could allow all students to continue in nursing or social work could allow all students to continue in social work, etc.) even when those students have unequivocally demonstrated repeatedly that they are incapable to performing race-neutrally or with cultural celebration, or with equivalent service and justice for all, etc. Chasing statistics can be the worst yardstick on which to judge educational systems' true "performance" "impact" and "value" to society and to the communities served. Although we are in what one might call "the assessment age" in education, we must all bear in mind that quantitative assessment by the numbers often measures the wrong things, rewards unhelpful practices, and over-simplifies and frequently mis-characterizes what is truly happening "on the ground" in our state schools. Many of these SDPLs focus on near-term quests such as GRADUATE or GET YOUR FIRST JOB or GET THAT CERTIFICATE when I think education should deliver on the potential all students have to improve their career trajectories, impact their communities with skills, judgment, critical analysis learned in educational institution. Numbers too often lie - focus on	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level.

real achievements instead. Further, every undergraduate institution across the US is scrambling for new enrollees/admits. Our path to success is to focus not on quantitative mirages but on qualitatively superlative content. For those in need, let's spend more public dollars on scholarships and budget grants to schools rather than over-populating the administrative suite of all these organizations and entities."	

Do the proposed state performance levels support the improvement of all CTE concentrators, including subgroups of students as specified in Section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965 and special populations, as described in Section 3(48)?	
Feedback via Public Comment Process	State Response
Start time: 12/8/2023 3:25:51 PM; End time: 12/8/2023 3:38:49 PM; Director of Enrollment at Minnesota State Tech College "Yes."	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 12/8/2023 5:04:12 PM; End time: 12/8/2023 5:30:22 PM; Teacher (K-12); "No comments"	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 12/20/2023 8:33:10 AM; End Time: 12/20/2023 12:08:20 PM; School leader (College Administrators, Secondary Administrators, etc.) "1S1 - Many of our CTE classes have students with IEPs that may continue their education in our transitional programs for ages 18-22. It would be ideal if either these students were pulled from this denominator, or we tracked these students 6 years later."	Thank you for your input. The students referred to in the comment would be considered "Continuing" within the current 1S1 denominator definition. All CTE Concentrators prior to graduation are included in the denominator, only those who graduate within four years are included in the numerator. The Perkins V legislation provides an option to report graduation beyond 4 years; however, the secondary technical advising committee opted not to be federally accountable for these data. Although these data are not part of Perkins state plan for federal accountability purposes, we can make a note to discuss the possibility of developing data reports at future

	leadership meetings, in support of local programs and continuous improvement.
Start time: 12/20/2023 2:21:41 PM; End Time: 12/21/2023 9:10:59 AM; School leader (College Administrators, Secondary Administrators, etc.); "No, they do not. We would need to be more accountable with non-trad represented by our special populations definitions, not just gender."	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level. Special Populations data are reported for every secondary and postsecondary performance indicator. Consortia, districts, and colleges are highly encouraged to review these data for local decision-making and strategic implementation purposes.
Start time: 1/2/2024 12:42:34 PM; End Time: 1/2/2024 1:03:34 PM; School leader (College Administrators, Secondary Administrators, etc.); "Yes"	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 1/7/2024 4:00:35 PM; End Time: 1/7/2024 4:23:29 PM; Faculty (College and University);School leader (College Administrators, Secondary Administrators, etc.); "See my comments to question 3"	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level.

Do the proposed state performance levels support the needs of the local education and business community?	
Feedback via Public Comment Process	State Response
Start time: 12/8/2023 3:25:51 PM; End time: 12/8/2023 3:38:49 PM; Director of Enrollment at Minnesota State Tech College "Yes."	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 12/8/2023 5:04:12 PM;	Thank you for your input. Minnesota looks forward to continuing to partner with our

End time: 12/8/2023 5:30:22 PM; Teacher (K-12); "I think it matters less about the performance level than the ability of the student to want to learn, be able to take criticism, show up on time, realize that hard work is what gets you to where you want to be, and have a good attitude towards peers and adults."	consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for our CTE teachers and administrators in support of students gaining both valuable marketplace skills and employable skills leading to high wage and in-demand careers.
Start time: 12/21/2023 1:06:29 PM; End Time: 12/21/2023 1:13:13 PM; Parent (Guardian);Teacher (K-12); "No as noted previously, 3P1 and 3S1 are not measuring all special pops."	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level. Special Populations data are reported for every secondary and postsecondary performance indicator. Consortia, districts, and colleges are highly encouraged to review these data for local decision-making and strategic implementation purposes.
Start time: 1/2/2024 12:42:34 PM; End Time: 1/2/2024 1:03:34 PM; School leader (College Administrators, Secondary Administrators, etc.); "Yes"	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 1/7/2024 4:00:35 PM; End Time: 1/7/2024 4:23:29 PM; Faculty (College and University);School leader (College Administrators, Secondary Administrators, etc.); "See my comments to question 3"	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level.

Public Comment Response for 2S3, Academic Proficiency in Science -- A separate public comment process was held July 15th through August 14th, 2024, for the 2S3 SDPL. The reason for this separate public comment process was because a proposed 2S3 SDPL had not been included in the original SDPL public comment period held December 8 through January 7, 2024.

Minnesota had not set an SDPL for the 2S3 indicator since the inception of Perkins V due to the process for conducting the science assessment in the state. Minnesota has not historically offered testing for academic proficiency in Science in a consistent manner throughout the state. Although the assessment is standardized, the grade in which students complete the assessment is not. Students sit for the science assessment in either 9th or 10th grade depending upon when they complete the Life Sciences requirements in their school districts. With this revision to the Minnesota State Perkins Plan, OCTAE will no longer allow for this exception. Following consultation with OCTAE staff, the decision was made to set an SDPL for 2S3 based on the previous year's statewide data from the science assessment. Results from the 2S3, Academic Proficiency in Science, public comment period are as follows:

Does the proposed state performance level for Science (2S3) meet the requirements of the law?	
Feedback via Public Comment Process	State Response
Start time 7/16/2024 1:25:28 PM End time 7/16/2024 1:27:53 PM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 7/17/2024 8:20:36 AM End time 7/17/2024 8:22:59 AM Teacher (K-12); Parent (Guardian); "No."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
State Time 7/17/2024 1:22:36 PM End Time 7/17/2024 1:24:35 PM Teacher (K-12); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/17/2024 3:21:44 PM End Time 7/17/2024 3:26:27 PM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.

Start Time 7/18/2024 6:27:52 AM End Time 7/18/2024 6:40:28 AM Faculty (College and University); "The law was not provided in any of the documents that we were given."	The title of the Perkins V Act, Strengthening Career and Technical Education for the 21st Century Act (Perkins V Act) was the hyperlink to the legislation. The link to the legislation was provided on the same page, directly above the Public Comment Notice.
Start Time 7/18/2024 10:28:10 AM End Time 7/18/2024 10:30:41 AM Teacher (K-12); Faculty (College and University);Employer; Parent (Guardian);School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/18/2024 10:47:17 AM End Time 7/18/2024 10:50:58 AM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 12:00:09 PM End Time 7/19/2024 12:02:20 PM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 1:39:56 PM End Time 7/19/2024 1:43:05 PM School leader (College Administrators, Secondary Administrators, etc.); "It appears to."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/26/2024 6:55:09 AM End Time 7/26/2024 7:06:33 AM	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students,

School leader (College Administrators, Secondary Administrators, etc.); "It appears to meet the requirements."	teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/26/2024 8:18:20 AM End Time 7/26/2024 8:50:34 AM Teacher (K-12); School leader (College Administrators, Secondary Administrators, etc.); Parent (Guardian); "Yes, it meets the letter of the law, EXCEPT in my district there is a strong "opt out of testing" contingency amongst families. When these families opt out, it has a negative impact on our testing score averages as it has historically been measured as a zero. There is also concern that the test does not accommodate the rising number of immigrant students in our district that would not have had a K-12 learning experience associated with MN Academic standards."	Only students who participated in the academic achievement assessment are included in the federal ESSA reporting for science. It is anticipated that Perkins reporting will follow similar guidelines. Meaning, Opt-Out students will not be included in the 2S3: Science assessment calculation for student outcome performance within Perkins federal reporting. Recently arrived students who are identified as English learners (RAEL), are required to participate in the assessment, however, their scores are exempted from counting in the federal ESSA (North Star) accountability calculations across all academic assessments. Students with limited or interrupted formal education (SLIFE) students must also be identified as English learners to qualify SLIFE—however, students with this designation are often not recently arrived students because the SLIFE designation can continue forward several years, whereas RAEL only applies to one year.
Start Time 7/26/2024 11:43:54 AM End Time 7/26/2024 11:50:26 AM Teacher (K-12); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/30/2024 8:19:03 AM End Time 7/30/2024 8:25:08 AM School leader (College Administrators, Secondary Administrators, etc.); "It appears to."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.

Start Time 7/30/2024 10:53:13 AM End Time 7/30/2024 11:07:50 AM Specialized instructional support personnel; "This is not a great measurement as MCAs are not required for students to take in MN. It also is not taken seriously by students, so scores would be severely unreliable. Based only on the percentages above, it does meet the requirement, however this data is not complete, nor reliable."	The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30, require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS. Similarly, ESSA and Minnesota Statutes 2022, section 124D.59, require that all English learners be assessed in English language proficiency. To meet these requirements, most English learners take the ACCESS for ELLs (ACCESS), but students who receive special education services and meet the participation criteria may take the Alternate ACCESS for ELLs (Alternate ACCESS) instead. For all statewide assessments, students enrolled any time during a testing window are expected to participate, and districts must attempt to test all students who are enrolled. For additional details, please see Participation Calculations for Statewide Assessments.
Start Time 7/31/2024 9:05:04 AM End Time 7/31/2024 9:14:36 AM Faculty (College and University); "The denominator section of the definitions states the "assessment scores were included in the State's ESSA computation." Science in not included in the ESSA computation."	The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30, require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS. Although there are additional criteria for reporting Math and Reading/ELA assessment outcomes for ESSA and Minnesota's North Star plan, all valid scores for academic achievement in Math, Reading/ELA, and Science are reported through the EdFacts system to our federal partners.

Does the proposed state-determined performance level in Science (2S3) support the needs of the local education and business community?	
Feedback via Public Comment Process	State Response
Start time 7/16/2024 1:25:28 PM End time 7/16/2024 1:27:53 PM School leader (College Administrators, Secondary Administrators, etc.); "No, nobody cares about science MCA."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 7/17/2024 8:20:36 AM End time 7/17/2024 8:22:59 AM Teacher (K-12); Parent (Guardian); "No."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
State Time 7/17/2024 1:22:36 PM End Time 7/17/2024 1:24:35 PM Teacher (K-12); "No."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/17/2024 3:21:44 PM End Time 7/17/2024 3:26:27 PM School leader (College Administrators, Secondary Administrators, etc.); "Somewhat... higher aim would better meet the need."	Thank you for your recommendation. We will consider this. We look forward to continuing to partner with our consortium leaders, teachers, business and industry partners and community leaders, and students in this important work.
Start Time 7/18/2024 6:40:28 AM End Time 7/18/2024 6:40:28 AM Faculty (College and University);	Thank you for your contribution. The 2019 Minnesota Academic Standards in Science were adopted in 2021 and are anticipated to be fully implemented in the 2024-2025 school year. CTE

"No, I have been teaching a sophomore college-level science course at a Community College for over 15 years. The number of students who have supposedly completed at least year of Biology and semester of chemistry who can't take notes, can't use a textbook (because they never had to actually learn anything), or worse can't even read or write a simple email has been increasing dramatically. Much of the state's High School science courses in the Twin Cities seem to be a total farce. Yes, they might be great to teach non-science majors about science. But as CTE they should not pass."	programs areas most aligned with the updated Science standards include Agriculture, Food, and Natural Resources (AFNR) and Health Science. Currently, there are 211 state-approved AFNR programs and 72 state-approved Health Science programs serving high school students across Minnesota.
Start Time 7/18/2024 10:28:10 AM End Time 7/18/2024 10:30:41 AM Teacher (K-12); Faculty (College and University); Employer; Parent (Guardian); School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/18/2024 10:47:17 AM End Time 7/18/2024 10:50:58 AM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 12:00:09 PM End Time 7/19/2024 12:02:20 PM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 1:39:56 PM End Time 7/19/2024 1:43:05 PM	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students,

School leader (College Administrators, Secondary Administrators, etc.); "Yes."	teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/21/2024 5:36:51 AM End Time 7/21/2024 5:39:07 AM Teacher (K-12); "I think it would be beneficial to allow students to meet graduation requirements for science by taking applied science classes or Career & Technical Education classes."	Within Career and Technical Education, there are possibilities within credit equivalencies at the local district level. Districts are currently implementing science for graduation requirements through CTE courses. For more information on the process, please see the Career and Technical Education (CTE) Credit Equivalency document posted on the Minnesota Department of Education's CTE main page and the Graduation Requirements website.
Start Time 7/26/2024 6:55:09 AM End Time 7/26/2024 7:06:33 AM School leader (College Administrators, Secondary Administrators, etc.); "I question aligning Science MCA scores with CTE performance since only a small percentage of CTE courses address the science standards."	Thank you for your comment. The 2019 Minnesota Academic Standards in Science were adopted in 2021, and are anticipated to be fully implemented in the 2024-2025 school year. CTE programs areas most aligned with the updated Science standards include Agriculture, Food, and Natural Resources (AFNR) and Health Science. Currently, there are 211 state-approved AFNR programs and 72 state-approved Health Science programs serving high school students across Minnesota.
Start Time 7/26/2024 8:18:20 AM End Time 7/26/2024 8:50:34 AM Teacher (K-12); School leader (College Administrators, Secondary Administrators, etc.); Parent (Guardian); "Though I agree that science is an important content area for all students and applies in various applications for CTE participants and concentrators, the performance level of 41.84% as a baseline is 11.62% higher than actual performance average over the past 10 years (omitting 2020 covid year) and a 7.84% increase over our previous years performance.	Federal guidance for setting State Determined Performance Levels (SDPL) is provided in the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). The goal is meaningful progress based on current performance outcomes at both the state and local levels. Trend data for all local Perkins consortia in Minnesota are taken into consideration, as well as the timeline for implementation of newly adopted standards and updated assessments.

Expecting CTE to be able to dramatically influence a 11.62% or 7.84% increase in performance in the first year of implementation seems excessive. Question: will the starting SDPL be customized for each Perkins consortia?"	
Start Time 7/30/2024 8:19:03 AM End Time 7/30/2024 8:25:08 AM School leader (College Administrators, Secondary Administrators, etc.); "How can this be determined by the information provided? What business community needs and input was provided to support this?"	Thank you for your comment and input. The communication strategy to inform and invite Public Comment around the State Determined Performance Level for academic proficiency in science involved notifying all business sectors and educational partners of the opportunity to provide input.
Start Time 7/30/2024 10:53:13 AM End Time 7/30/2024 11:07:50 AM Specialized instructional support personnel; "No. Again, since the MCAs are not required and not taken seriously by students, we have unreliable data to identify if this is a tool that industry or post-secondary is interested in capturing for a performance indicator."	The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30, require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS.
Start Time 7/31/2024 9:05:04 AM End Time 7/31/2024 9:14:36 AM Faculty (College and University); "Maybe."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.

Does the proposed state-determined performance level for Science (2S3) support the improvement of all CTE concentrators, including subgroups of students as specified in Section 1111(c)(2)(B) of the Elementary and Secondary Education Act of 1965 and special populations, as described in Section 3(48)?

Feedback via Public Comment Process	State Response
Start time 7/16/2024 1:25:28 PM End time 7/16/2024 1:27:53 PM School leader (College Administrators, Secondary Administrators, etc.); "Sure."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 7/17/2024 8:20:36 AM End time 7/17/2024 8:22:59 AM Teacher (K-12);Parent (Guardian); "No."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
State Time 7/17/2024 1:22:36 PM End Time 7/17/2024 1:24:35 PM Teacher (K-12); "Idk."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/17/2024 3:21:44 PM End Time 7/17/2024 3:26:27 PM School leader (College Administrators, Secondary Administrators, etc.); "I do not see factors that call out subgroups in the Science language/performance level and thus am unaware of any specifics related to special populations."	Student outcomes on all academic proficiency (Math, Reading/ELA, and Science) are required to be publicly reported according to federally defined student groups, both for ESEA (Section 1111(h)(1)(C)(ii) and Perkins V (Section 113(3)(A)(III)(bb)).
Start Time 7/18/2024 6:40:28 AM End Time 7/18/2024 6:40:28 AM Faculty (College and University); "Why is there not a link to this act in the introduction/background? Clearly you mainly	The title of the Perkins V Act, Strengthening Career and Technical Education for the 21st Century Act (Perkins V Act) was the hyperlink to the legislation. The link to the legislation was provided on the same website, directly above the Public Comment Notice. Minnesota

want input from High School teachers and not business or college teachers.”	Department of Education welcomes and appreciates comments from those interested in contributing to the process. Thank you for your input.
Start Time 7/18/2024 10:28:10 AM End Time 7/18/2024 10:30:41 AM Teacher (K-12); Faculty (College and University); Employer; Parent (Guardian); School leader (College Administrators, Secondary Administrators, etc.); “Yes.”	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/18/2024 10:47:17 AM End Time 7/18/2024 10:50:58 AM School leader (College Administrators, Secondary Administrators, etc.); “Yes.”	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 1:39:56 PM End Time 7/19/2024 1:43:05 PM School leader (College Administrators, Secondary Administrators, etc.); “Appears to.”	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/26/2024 6:55:09 AM End Time 7/26/2024 7:06:33 AM School leader (College Administrators, Secondary Administrators, etc.); “Unclear.”	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/26/2024 8:18:20 AM	The Perkins V legislation requires the state to make meaningful progress toward

End Time 7/26/2024 8:50:34 AM Teacher (K-12); School leader (College Administrators, Secondary Administrators, etc.); Parent (Guardian); "Historically all subgroups, except white, and native Hawaiian/pacific islander, in my consortia have NEVER reached a 41.84% average on the MN Science MCA. I'm concerned that the exam that is being used to measure this metric may have "lived experience bias" unconsciously embedded in the questions."	improving the performance of all career and technical education students, including the subgroups of students described in ESSA (Section 1111(h)(1)(C)(ii) and Perkins V (Section 113(3)(A)(III)(bb)). The updated Minnesota Comprehensive Assessment (MCA) and alternative MCA (for qualifying students) was created to assess comprehension of the newly adopted science standards. Individual assessment items were piloted and validated with members from all legislatively defined student groups such that the assessment is fair and equitable for all Minnesota students and student groups.
Start Time 7/30/2024 8:19:03 AM End Time 7/30/2024 8:25:08 AM School leader (College Administrators, Secondary Administrators, etc.); "The date used isn't accurate. MCA testing is optional. How can an optional assessment be used to determine proficiency?"	The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30, require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS. For all statewide assessments, students enrolled any time during a testing window are expected to participate, and districts must attempt to test all students who are enrolled. For additional details, please see Participation Calculations for Statewide Assessments.
Start Time 7/30/2024 10:53:13 AM End Time 7/30/2024 11:07:50 AM Specialized instructional support personnel; "No. The data collected will not show an accurate representation of ALL students (including historically underrepresented students) and since the test is not required, data will be incomplete and unreliable."	The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30, require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS. For all statewide assessments, students enrolled any

	time during a testing window are expected to participate, and districts must attempt to test all students who are enrolled. For additional details, please see Participation Calculations for Statewide Assessments .
Start Time 7/31/2024 9:05:04 AM End Time 7/31/2024 9:14:36 AM Faculty (College and University); "There is not enough information to make that determination."	Thank you for your comment. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.

State Determined Performance Level (SDPL) Public Comment Process for Grant Year 6 (2025-2026)

Minnesota developed revised SDPLs for Grant Year 6, covering program year 2025-2026, in accordance with OCTAE Program Memorandum 25-1. The methodology used to establish the SDPLs follows the guidelines in Perkins V Sec. 113 (b)(3)(A)(III) which require the SDPLs for each indicator to be higher than the average actual performance of the two most recently completed program years (grant years 3 and 4). The legislation also requires the SDPLs to show continuous meaningful progress (i.e., not remain flat from year to year).

A public comment period for consideration of the revised SDPLs was held March 7, 2025 through April 7, 2025. A total of 21 comments were received over the 30-day period for the three proposed questions. Details about each comment are displayed in the table below along with the response from Minnesota Department of Education and/or Minnesota state staff.

Do the proposed state-determined performance levels meet the requirements of the law?	
Feedback via Public Comment Process	State Response
Start time 3/10/2025 8:44:50 AM End time 3/10/2025 8:46:16 AM Teacher (K-12);Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/10/2025 8:48:12 AM	Thank you for your input. Minnesota Department of Education looks forward to continuing to

End time 3/10/2025 8:54:44 AM Teacher (K-12);Parent (Guardian); "Yes."	partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/10/2025 10:18:04 AM End time 3/10/2025 10:28:01 AM Teacher (K-12); "How can 90+ percent graduate but Math and English scores are much are much lower. Does Perkins V even talk about graduation standards?"	Thank you for your input. Perkins V includes a secondary accountability indicator for the 4-year Graduation Rate in alignment with ESEA performance measures. Math, Reading, and Science performance indicators are also assessed. In Minnesota, students are required to complete two kinds of requirements by the time they graduate. Students must: • Satisfactorily complete all state academic standards and, for example in the case of Career and Technical Education, local academic standards for coursework where state standards do not apply Minnesota Statutes 2024, Section 120B.022. • Satisfactorily complete the state credit requirements under Minnesota Statutes 2022, section 120B.024.
Start time 3/10/2025 3:09:07 PM End time 3/10/2025 3:15:35 PM Teacher (K-12); "I think they did the best they could do. The desire of the students to learn the material must be considered. Some of my kids LOVE the creating, but not the reading about the creating."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/11/2025 7:46:44 AM End time 3/11/2025 7:54:57 AM Teacher (K-12); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/13/2025 10:11:17 AM End time 3/13/2025 2:05:00 PM Teacher (K-12);	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and

"Yes."	community leaders, and postsecondary partners, in this important work.
Start time 4/3/2025 10:17:54 AM End time 4/3/2025 10:25:09 AM Teacher (K-12);Faculty (College and University);Parent (Guardian); "No. In order to graduate from a MN high school there are several course requirements that are not even addressed much less meet the requirements of the law."	Thank you for your input. In Minnesota, students are required to complete two kinds of requirements by the time they graduate. Students must: • Satisfactorily complete all state academic standards and, for example in the case of Career and Technical Education, local academic standards for coursework where state standards do not apply Minnesota Statutes 2024, Section 120B.022. • Satisfactorily complete the state credit requirements under Minnesota Statutes 2022, section 120B.024.

Do the proposed state-determined performance levels support the improvement of all CTE concentrators, including subgroups of students as specified in Section 1111(c)(2)(B) of the Elementary and Secondary Education Act of 1965 and special populations, as described in Section 3(48)?	
Feedback via Public Comment Process	State Response
Start time 3/10/2025 8:44:50 AM End time 3/10/2025 8:46:16 AM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/10/2025 8:48:12 AM End time 3/10/2025 8:54:44 AM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/10/2025 10:18:04 AM End time 3/10/2025 10:28:01 AM Teacher (K-12)	Thank you for your input. Minnesota Department of Education apologizes for any inconveniences you experienced and will take your recommendation under

"Instead of making us look up the section maybe you could put it in the question."	advisement within future public comment posts.
Start time 3/10/2025 3:09:07 PM End time 3/10/2025 3:15:35 PM Teacher (K-12); "Support is great. In a small school, we have few subgroups. We also have much fewer resources. The focus needs to be on how to get us industry standard equipment and training on how to use it, in partnership with local industry."	The purposes of the Perkins V grant include assisting with the needs you have expressed. Federal resources are dispersed from the state to local Perkins consortia whose role is to oversee how resources are spent on innovative equipment and teachers' professional development needs in alignment with local business and industry. Local needs are assessed on a biennial basis as part of a Comprehensive Local Needs Assessment (CLNA) process which includes data and information from several sources. Programmatic decisions and budgeting priorities are based on CLNA results. Positive education and career outcomes for all Minnesota students is important to the future of our community as well as state and local economies.
Start time 3/11/2025 7:46:44 AM End time 3/11/2025 7:54:57 AM Teacher (K-12); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/13/2025 10:11:17 AM End time 3/13/2025 2:05:00 PM Teacher (K-12); "The information above did not lead me to the specific section you wanted me to review. Your nomenclature didn't align easily with the summary of	The Elementary and Secondary Education Act language is in reference to the race/ethnic student groups as well as special populations. Within the public comment website posted from March 7-April 7, 2025, a direct link to "Accountability Resources" was also

the ACT that I found at this URL: https://www.ed.gov/sites/ed/files/documents/essa-act-of-1965.pdf	provided; information about these student groups continues to be available Minnesota State - Consortium Resources. Minnesota Department of Education appreciates your feedback and will ensure this information is more clear and more readily available in future Public Comment opportunities.
Start time 4/3/2025 10:17:54 AM End time 4/3/2025 10:25:09 AM Teacher (K-12); Faculty (College and University); Parent (Guardian); "No. If all performance levels were actually supported then yes, they would support the improvement of CTE concentrators. However, only the technical side of this program is supported. There are no funds given to help improve reading or math skills."	How Perkins V funding is apportioned at the local level in support of grant initiatives is decided by individual consortia. Across all Perkins consortia, it is entirely possible to support the integration of State Technical Reading and Math content standards into local Career and Technical Education frameworks, develop innovative hands-on classroom projects, and support teachers' professional development needs. Minnesota Department of Education highly encourages this work and is in support of these efforts.

Do the proposed state performance levels support the needs of the local education and business community?	
Feedback via Public Comment Process	State Response
Start time 3/10/2025 8:44:50 AM End time 3/10/2025 8:46:16 AM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/10/2025 8:48:12 AM End time 3/10/2025 8:54:44 AM Teacher (K-12); Parent (Guardian); "No - Construction is being underrepresented because they cannot participate in WBL on a Construction Site. Construction Courses should be counted as WBL	As we know, there are many valuable construction-related projects implemented in high school classroom settings, the state will take your perspective under advisement. Currently, high school students have access to engage in this type of employment or internship within the construction industry when the experience takes place in an office setting, headquarters, and possibly a training facility rather than on or about a construction site. These opportunities allow students to

Experiences because this is the only way for them to get the experience.”	be involved in learning more about the industry as well as maintain safety needs.
Start time 3/10/2025 10:18:04 AM End time 3/10/2025 10:28:01 AM Teacher (K-12) “No. Maybe the state should look at how they distribute funds and align closer to the federal law. MN performance in Math and English is bad. Why not have high expectations and if a student can't meet, they don't graduate. When only 50% can meet English standards and 30% meet Math how does that help the Secondary education or the business community!”	Thank you for your recommendation. Across all Perkins consortia, it is entirely possible for local consortia to allocate financial resources toward the integration of State Reading and Math content standards into local Career and Technical Education frameworks, develop innovative hands-on classroom projects that demonstrate mastery of these content area standards and to develop these classroom projects in collaboration with business and industry/postsecondary partners, as well as support teachers' professional development, as needed. Minnesota Department of Education highly encourages this work and is in full support of these ongoing local efforts.
Start time 3/10/2025 3:09:07 PM End time 3/10/2025 3:15:35 PM Teacher (K-12); “I have a few students that may be below these goals and yet would meet the needs of the business community. So, where do those students fit in the survey?”	Thank you for your comment. The goal of the state's continuous improvement efforts is to provide support toward consistently improving both students' academic and career outcomes. It is encouraging to hear that students are meeting local business community needs even as we strive to make greater gains in our students' academic outcomes. It is our hope that the state targets will be both meaningful and attainable.
Start time 3/11/2025 7:46:44 AM End time 3/11/2025 7:54:57 AM Teacher (K-12); “Yes.”	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/13/2025 10:11:17 AM End time 3/13/2025 2:05:00 PM Teacher (K-12); “I concur that Work-Based Learning should be an SDPL metric for Perkins,	Thank you for your response. We are grateful to have experienced an ongoing increase in the percentage of students engaging in Work-Based Learning (WBL) training courses (course 97) within Minnesota. Many districts have begun to offer Career Seminar (course 95) content alongside the work experience (course 97) opportunities for the reasons you have outlined; their programs and

but I think that requiring a community-based internship (9090-97) versus Career Seminar (9090-95) is unrealistic with the additions of graduation requirements that have been added the past few years. Many students don't have time in their high school journey to take both classes, especially if each is a minimum of a semester-long commitment. I am also concerned that we continue to use MCA test results as a metric when so many families have begun to "opt out" of these tests and an opt-out by a CTE concentrator affects our metrics negatively."	students have been very successful in meeting the goals of their local Perkins plans. There is no language in either the Perkins or ESEA legislation stating that "opt out" scores need to be included in the Perkins accountability calculation for Academic Achievement in Reading, Math, or Science. For this reason, CTE Concentrators who would otherwise earn a zero on high academic achievement assessments are not included in either the numerator or denominator of Perkins accountability outcomes. However, it is also important to keep in mind that Minnesota Statutes, section 120B.30, subdivision 1 (p), defines career and college readiness (CCR) as follows: "For purposes of statewide accountability, career and college readiness means a high school graduate has the knowledge, skills, and competencies to successfully pursue a career pathway, including postsecondary credit leading to a degree, diploma, certificate, or industry-recognized credential and employment. Students who are career and college ready can successfully complete credit-bearing coursework at a two- or four-year college or university or other credit-bearing postsecondary program without need for remediation." In alignment with Minnesota's CCR initiative, CCR scores are provided for students who take the grades 10 and 11 Reading and Mathematics Minnesota Comprehensive Assessments-Series III (MCA-III) assessments. The CCR goal scores act as cut scores for career and college readiness based on students' performance on the MCA-III. The Individual Student Reports (ISRs) for the grade 10 Reading and grade 11 Mathematics MCA-III include a section describing the student's MCA-III score in context of the CCR goal score for that subject. The MCA-III scores and CCR goal scores are on the same scale, and an MCA-III score at or above the goal score is considered on track to demonstrate career and college readiness in the corresponding subject on a college entrance exam at the end of grade 11. Additional details regarding the

	Technical Report for Career and College Readiness can be found at: https://education.mn.gov/MDE/dse/test/Tech/index.htm
Start time 4/3/2025 10:17:54 AM End time 4/3/2025 10:25:09 AM Teacher (K-12); Faculty (College and University); Parent (Guardian); “No. They are levels. Schools need actual support in order to meet anything and that support is only being given to our technical courses. Students need communication skills and basic math skills in order to be successful in a career outside of high school.”	Perkins V funding is apportioned at the consortium level in support of grant initiatives according to locally determined needs. Across all Perkins consortia, it is entirely possible to support the integration of State Technical Reading and Math content standards into local Career and Technical Education frameworks, develop innovative hands-on classroom projects, and support teachers’ professional development needs. Minnesota Department of Education (MDE) highly encourages this work and is in support of these efforts. MDE also encourages students to pursue Work Based Learning opportunities as part of state-approved Perkins-CTE programs which further assists students toward refining communication and employability skills.

State Determined Performance Level (SDPL) Public Comment Process for Grant Year 6 (2026-2027)

Minnesota developed revised SDPLs for Grant Year 7, covering program year 2026-2027, in accordance with OCTAE Program Memorandum 25-1. The methodology used to establish the SDPLs follows the guidelines in Perkins V Sec. 113 (b)(3)(A)(III) which require the SDPLs for each indicator to be higher than the average actual performance of the two most recently completed program years (grant years 4 and 5). The legislation also requires the SDPLs to show continuous meaningful progress (i.e., not remain flat from year to year).

A public comment period for consideration of the revised SDPLs was held January ?, 2026 through February ?, 2026. A total of ? comments were received over the 30-day period for the three proposed questions. Details about each comment are displayed in the table below along with the response from Minnesota Department of Education and/or Minnesota state staff.

- 5) DESCRIBE HOW THE ELIGIBLE AGENCY WILL ADDRESS DISPARITIES OR GAPS IN PERFORMANCE AS DESCRIBED IN SECTION 113(B)(3)(C)(II)(II) OF PERKINS V IN EACH OF THE PLAN YEARS, AND IF NO MEANINGFUL PROGRESS HAS BEEN ACHIEVED PRIOR TO THE THIRD PROGRAM YEAR, A DESCRIPTION OF THE ADDITIONAL ACTIONS THE ELIGIBLE AGENCY WILL TAKE TO ELIMINATE THESE DISPARITIES OR GAPS. (SECTION 122(D)(11) OF PERKINS V)

As part of the written response, and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP), the eligible agency could indicate that it will analyze data on the core indicators of performance to identify gaps in performance, explain how they will use evidence-based research to develop a plan to provide support and technical assistance to eligible recipients to address and close such gaps, and how they will implement this plan. The eligible agency is not required to submit a new State plan prior to the third program year in order to address this requirement.

Secondary

Minnesota Department of Education continues to develop dynamic reports which allow consortium leaders and district staff to quickly identify any gaps in performance that may exist between federally reported student groups. These reports are updated annually in order to monitor trends in performance as well as progress toward closing any existing gaps. Webinars, group presentations, and individual assistance are provided in order to ensure that secondary consortium leaders understand the measures used within the reports as well as how to interpret the information. The goal of providing this assistance is to ensure that consortium leaders are able to facilitate conversations with CTE teachers and district administrators so that meaningful gaps can be identified and are actionable.

Challenges in identifying performance gaps are outlined in the postsecondary section and also apply to the secondary reports. Solutions to these issues will be addressed by providing consortium leaders with a 'heat map' of performance gap trends, organized by performance indicator and disaggregated student group. Larger, more meaningful, performance gaps will be highlighted for ease in interpreting the information and consortium leaders will be given the opportunity to receive technical support and assistance as needed. We feel that providing this information in this format is critical for use in prioritizing the needs and work around reducing and eliminating performance gaps, most especially in preparation for engaging in CLNA work and strategic programmatic decision making.

Postsecondary

Minnesota State reviews postsecondary reports available at the state and consortium level that compare performance on the indicators to the SDPLs to identify subgroups, special populations, and/or clusters that have gaps in performance compared to the SDPLs. However, due to the COVID-19 pandemic, Minnesota State requested and received OCTAE approval to adjust postsecondary SDPLs for grant years 2 through 4 in spring/summer 2022. Minnesota State expected the COVID-19 pandemic to negatively impact performance on the postsecondary

indicators for grant years 2 through 4, so consequently lowered the SDPLs to reflect this negative impact throughout the remaining years of the grant (through year 4). While the Perkins V legislation requires states to address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V each of the plan years (i.e., requiring comparing performance on the indicators **to the SDPLs**), identifying gaps in performance using only this method can lead to interpreting decreases in gaps as being caused by improving performance when, in reality, decreases in gaps could actually be due to the adjustment/lowering of the SDPLs for grant years 2 through 4. To remedy this possible misinterpretation when analyzing gaps data, Minnesota also prepares and reviews reports at the state and consortium level that compare performance on the indicators to the performance of all CTE Concentrators. This comparison allows the state or consortia to identify additional subgroups, special populations, and/or clusters that have gaps in performance compared to the performance of all concentrators measured for each indicator, not just the SDPLs established for each metric.

At the state level, after review of the data, the postsecondary data team summarizes and reviews the findings with the state CTE leadership team to assist them in identifying special populations and demographic groups that have persistent and meaningful gaps in performance on the indicators. The state leadership team then identifies the additional actions the state will take to eliminate these disparities or gaps.

Priorities

Both Minnesota State and the Minnesota Department of Education are committed to addressing disparities or gaps in performance of our students. MDE's equity statement follows: Educational equity is the condition of justice, fairness, and inclusion in our systems of education so that all students have access to the opportunities to learn and develop to their fullest potential. The pursuit of educational equity recognizes the historical conditions and barriers that have prevented opportunity and success in learning for students based on their races, incomes, and other social conditions. Eliminating those structural and institutional barriers to educational opportunities requires systemic change that allows for distribution of resources, information and other support depending on the student's situation to ensure an equitable outcome.

Minnesota State has established the following goal: "By 2030, Minnesota State will eliminate education equity gaps at every Minnesota State college and university."

Under the umbrella of these statements and goals, multiple initiatives are in place to address disparities or gaps in performance. For example, within the Minnesota Department of Education there is an effort to better align CTE work and ESSA initiatives. We support and collaborate with state specialists and educators in our special education division, homeless student liaison staff, as well as our English learner division, all of whom work toward reducing and eliminating gaps in performance.

There is also state legislation annually requiring each district to identify any existing gaps in performance as well as to document strategies for closing those gaps. Secondary consortium leaders are able to access a summary of their districts' publicly available World's Best Workforce and achievement and integration plans in order to determine whether CTE students would benefit from additional support of existing district goals and strategies or whether more is needed in order to support CTE teachers and students more specifically. Finally, it is also anticipated that secondary staff would utilize and share forward any resources produced by Advance CTE, Regional Education Laboratory (REL), or Midwest Comprehensive Center in support of continuous improvement for all CTE students.

With these overarching goals, and the principle of equity within our state's Perkins plan, our work will align with and continue to focus on:

- Disaggregation of student data metrics to inform equity work and develop mechanisms to share data and review
- Providing consultative and communicative structures
- Incentivizing innovations to enhance access, improve student engagement and support, mitigate policy barriers, and expand workforce diversity and strategic talent management

The reserve allocation distributed to local consortia at 15% is one opportunity for financial support for this equity work. In addition, the state will continue to invest leadership funds to support professional development and technical assistance at the state and local levels. Individual consortium interventions will arise from the CLNA.

ASSURANCES, CERTIFICATIONS, AND OTHER FORMS

STATUTORY ASSURANCES

Verified electronically.

EDGAR CERTIFICATIONS

Verified electronically.

OTHER FORMS

Verified electronically.

APPENDIX

RESPONSES TO PUBLIC COMMENTS ON THE STATE PLAN ANNUAL REVISION

12 individuals submitted comments on Minnesota's state plan priorities and activities during the 30-day period. Details about each comment are displayed in the table below along with the response from Minnesota State and/or MDE staff.

Feedback via Public Comment Process	State Response
Start time: 12/8/2023 12:05:28 PM; End Time: 12/8/2023 12:14:50 PM; Teacher (K-12); Minnesota's Secondary CTE teachers have to fill out program approval and other items every 5 years. This process has been made progressively more difficult and seems to "never be good enough". There is no additional compensation or time given to the secondary teacher to do this and can only be done by them. At the same time, unlicensed and unqualified CTE teachers are coming into the classroom on variances who have no idea about how to do any of this and are able to access Perkins funding. There are no CTE teachers with the background to come into positions that know how to do all of this nor do they know how to manage a classroom, etc., and yet we are letting them access Perkins funds and making the program approval so difficult that it either is not going to get done or an experienced teacher will be left with the responsibility to do it all without extra time or compensation. Minnesota's program specialists should not be making it their mission to make things hard for the teachers that are doing the work but should perhaps be focusing more on ensuring there is a pipeline of qualified teachers to fill jobs. Perkins money could be used to create more licensing and incentives to get more Business, FACS, AG, etc., teachers who are fully qualified to manage and teach in our secondary schools. If this is not fixed, nothing	Thank you for your feedback. Program approval is an important process to ensure CTE program quality and is required by Minnesota Rule 3505.2550. Program specialists want to help you with this process; please reach out to them for technical assistance. Please continue to provide feedback on how we can improve the program review process. All CTE teachers in Minnesota are appropriately licensed. In positions that are difficult to fill, individuals may be able to receive an Out-of-Field permission (OFP) from the Professional Educator Licensing and Standards Board (PELSB). It is difficult to fill some CTE teaching positions in many areas of the state. Teacher recruitment, retention, and training is a continuing focus in Minnesota and is a priority of the Perkins legislation.

else will work because you will be missing a critical part of the process--qualified CTE teachers at the high school level.	
Start time: 12/8/2023 3:38:49 PM; End Time: 12/8/2023 5:30:22 PM; Director of Enrollment at Minnesota State Tech College; Our college enrollment is at an all-time high and Perkins funding is vital to help develop pathways for the future of our young adults, communities and the State.	Thank you for your comment. CTE is critical to helping students achieve success in high-skill, high-wage, and in-demand careers.
Start time: 12/8/2023 5:04:12 PM; End Time: 12/8/2023 5:30:22 PM; Teacher (K-12); As a part time, small, rural 7-12 tech ed teacher (I teach 5-12 band during the other ½ of the school day), first, I must say that Perkins V money has completely transformed my shop. I have moved from just construction skills to CNC routing and plasma machines. I have replaced antiquated machines and updated my machines closer to what one might use in a smaller industry. This summer, I took AutoCAD training and Perkins V paid for the class. Because of my limited teaching time, I have a hard time finding a way to build upon introductory level classes. I want to expose my students to a wide variety of careers in the hope that they may find some desire to pursue in industry or in a trade school. I think there is value in small schools focusing on just one thing...especially in small schools. I grew up in a VERY rural NW Minnesota school of 150 students K-12. The reason I decided to become a shop teacher 10 years ago was from ONE introductory level class I had in high school for building small cabinets. Please don't limit our plan authorization to just pathways that go beyond introductory for those of us that are the only tech ed teacher in the school. We can offer	Thank you for your comment and your commitment to Career and Technical Education. As you have indicated, small, rural schools face unique challenges in providing CTE programs to students. For this reason, Minnesota has structured the Perkins Reserve funding to focus on areas of high-concentrations of CTE participants and in rural areas. Please connect with your school and district administrators and Perkins grant coordinators to inform them of your needs in the classroom. They are in the best position to help you expand your CTE offerings. Your input is vital to the Comprehensive Local Needs Assessment conducted at least every two years.

lots of different things....just not as deep as you wish we could. Thank you!	
Start time: 12/11/2023 8:27:29 AM; End Time: 12/11/2023 8:29:44 AM; Teacher (K-12); I hope more goes back to schools and students than what happens currently. I teach in South Central MN and my first 5 years we would get money into our district to help get students access to equipment that we couldn't get otherwise. The last 7 of our CTE departments have received \$0. Where does all this money go?	Thank you for your comment. Perkins funding is distributed by formula to 23 regional consortia throughout the state. Your district is a member of one of these Perkins consortia. Each consortium conducts a Comprehensive Local Needs Assessment (CLNA) at least every two years to determine what the needs are for the region. Based on the consortium needs identified in the CLNA, Perkins consortium leadership teams determine how to prioritize their use of funds. Use of funds is based on needs; some districts may receive more funding than others and some may receive no funding for a particular year. Find out which Perkins consortium your district is a member of and discuss with administrators how funding decisions are made for the consortium. Your input is vital to this process; make sure administrators are aware of the needs of your program.
Start time: 12/11/2023 8:50:04 AM; End Time: 12/11/2023 8:53:20 AM; Teacher (K-12); As a long-time technical educator, one of the most challenging things is the availability of consumable supplies. There should be some provisions in the funding to allow for this.	Thank you for your comment. Each local recipient of Perkins funding should use such funds to develop, coordinate, implement, or improve Career and Technical Education programs. Because consumable supplies are a part of the basic operational costs required to conduct a course or program, they should be funded with state or local funds. Perkins funding is intended to supplement CTE programs beyond their normal operational costs and cannot be used to supplant (replace) state or local funds. Using federal Perkins dollars for consumable supplies would constitute supplanting of state or local funds and would therefore be unallowable according to Perkins legislation. It's important to note that in Minnesota, costs for consumable supplies may be included in the state CTE levy intended to support some costs of CTE programs.
Start time: 12/20/2023 11:43:17 AM; End Time: 12/20/2023 11:56:59 AM; School leader (College Administrators, Secondary Administrators, etc.);	Thank you for your comment. Perkins consortia determine, based on the results of the Comprehensive Local Needs Assessment, how reserve funding will be used in their CTE programs. As such, there is local control in

The reserve funds may be too limiting. We would like more local control. "15% will be distributed as reserve funding to target support for rural areas and applications serving high numbers of CTE students." (Which is on the summary page and page 61 in the plan) It would be preferred if the 11 narratives and the performance indicators were more aligned. Secondary Core indicator 4S1 focuses on non-trad (gender). (page 10 of 24 of the grant template) Should this be a measurement for all Special Pops? Nontrad seems outdated.	determining how funds are used at the local level. Perkins legislation requires that reserve funding be used to foster innovation through the identification and promotion of promising and proven CTE programs, practices, and strategies; or to promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, high-wage, or in-demand occupations or industries. Regarding alignment of narratives and performance indicators, it's important to note that Narratives #1 through #9 are required by Perkins legislation to be included in the local application for funding. Performance indicators are also specified by legislation. Therefore, better alignment of narratives #1-#9 with performance indicators would require a change to the Perkins legislation. Narratives #10 and #11 were added at the state level to provide more information on use of reserve funding at the local level and to determine procedures for consortium governance. Individuals preparing for non-traditional fields is one of 9 categories of special populations defined in Perkins legislation. Some students fall under 2 or more of the special population categories. In fact, non-traditional participation (4S1) does apply to all students including students in special populations as defined in Perkins legislation. A career pathway is considered "non-traditional" for a gender if less than 25% of employees in those fields are of that specific gender. The intent of tracking non-traditional participation is to encourage more of a balance in gender participation in these fields to provide more opportunity for individuals in the workforce and to better fill workforce shortages.
Start time: 12/20/2023 11:54:41 AM; End Time: 12/20/2023 11:57:56 AM;	Thank you for your comment. Academic Affairs has been included as suggested.

School leader (College Administrators, Secondary Administrators, etc.); Need to add Academic Affairs to the specificity of the area outlines in Academic and Student Affairs (p.10) especially since early college opportunities, program approval and transfer, faculty credentialing, and etc. are functions of Academic Affairs.	
Start time: 12/20/2023 8:33:10 AM; End Time: 12/20/2023 12:08:20 PM; School leader (College Administrators, Secondary Administrators, etc.); The plan looks really good - I found some new resources/websites that we can use in our district. I was happy to see the the funding was 50/50 for Secondary and Postsecondary. I would like to see 1.) The language for reserved funding be open to local control instead of focusing on rural & # of CTE Students. 2.) Increased alignment with the 11 narratives and the performance core indicators. 3.) Secondary Core Indicator 4S1 focuses on non-trad (gender). Nontrad seems outdated as WIOA pulled it from their outcomes over 10 years ago. The focus is all on Performance Gaps and Special Populations. Should this indicator measure # of Spec Pops instead of non-trad?	Thank you for your comment. You may be confusing how Reserve funds are distributed with how these funds are used at the local level. Perkins legislation directs that Reserve funds may be awarded to local recipients in rural areas, and/or areas with high percentages or numbers of CTE participants. However, Perkins consortia determine, based on the results of the Comprehensive Local Needs Assessment, how reserve funding will be used in their CTE programs. As such, there is local control in determining how funds are used at the local level. Perkins legislation requires that reserve funding be used to foster innovation through the identification and promotion of promising and proven CTE programs, practices, and strategies; or to promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, high-wage, or in-demand occupations or industries. Regarding alignment of narratives and performance indicators, it's important to note that Narratives #1 through #9 are required by Perkins legislation to be included in the local application for funding. Performance indicators are also specified by legislation. Therefore, better alignment of narratives #1-#9 with performance indicators would require a change to the Perkins legislation. Narratives #10 and #11 were added at the state level to provide more information on use of reserve funding at the local level and to determine procedures for consortium governance.

	Individuals preparing for non-traditional fields is one of 9 categories of special populations defined in Perkins legislation. Some students fall under 2 or more of the special population categories. In fact, non-traditional participation (4S1) does apply to all students including students in special populations as defined in Perkins legislation. A career pathway is considered “non-traditional” for a gender if less than 25% of employees in those fields are of a specific gender. The intent of tracking non-traditional participation is to encourage more of a balance in gender participation in these fields to provide more opportunity for individuals in the workforce and to better fill workforce shortages.
Start time: 12/20/2023 2:21:41 PM; End Time: 12/21/2023 9:10:59 AM; School leader (College Administrators, Secondary Administrators, etc.); The reserve funds are limiting. We would like more local control. "15% will be distributed as reserve funding to target support for rural areas and applications serving high numbers of CTE students." Reserve is always confusing for us to manage, and it would be better to reduce the percentage significantly or remove reserve altogether. Better align the 11 narratives and the performance indicators. 3P1 and 4S1 focus on non-trad (gender). This is not at all aligned with our MinnState equity 2030 goal, nor is it what our industry partners are asking for. We need special populations to be measured in this indicator, not just gender. Secondary should have a larger portion of the allocation. Typically they are splitting between multiple school districts, having to manage and report, while there are typically only 1-2 post-secondary partners at each	Thank you for your comment. You may be confusing how Reserve funds are distributed with how these funds are used at the local level. Perkins legislation directs that Reserve funds may be awarded to local recipients in rural areas, and/or areas with high percentages or numbers of CTE participants. However, Perkins consortia determine, based on the results of the Comprehensive Local Needs Assessment, how reserve funding will be used in their CTE programs. As such, there is local control in determining how funds are used at the local level. The percentage of Reserve funding is determined at the state level, so it is possible to revise this percentage on a scale from 0% to 15%. Minnesota decided in the original Perkins V 4-Year State Plan to set the Reserve funding level at 15%. After considering other options, we decided to maintain the Reserve funding level at 15%, primarily because most consortia would see a significant decrease in their award if Reserve funding was reduced or cut altogether. Please contact us if you are confused about the use of Reserve funding. We would be happy to provide technical assistance to address this confusion.

Page 4 of 7 table. (I'm saying this as a post-secondary rep!)	Regarding alignment of narratives and performance indicators, it's important to note that Narratives #1 through #9 are required by Perkins legislation to be included in the local application for funding. Performance indicators are also specified by legislation. Therefore, better alignment of narratives #1-#9 with performance indicators would require a change to the Perkins legislation. Non-traditional participation performance indicators are federal indicators applicable to all states and therefore may not be in alignment with Minnesota State Equity 2030 goals. When Perkins V was implemented, Minnesota decided on a 50/50 split of funding to secondary and postsecondary. We've decided to continue with this split in this state plan update because there were no concerns or specific rationale made known to us as to why it should be changed. Determining the funding split is a state decision and, as such, can be reconsidered at any time.
Start time: 12/21/2023 1:06:29 PM; End Time: 12/21/2023 1:13:13 PM; Parent (Guardian); Teacher (K-12); 1. The reserve funds may be too limiting and prescriptive. I would like to see more local control. 2. I would think that if the 11 narratives and the performance indicators were more aligned, it would be easier to track success. 3. Secondary Core indicator 4S1 focuses on non-trad (gender). (page 10 of 24 of the grant template) Should this be a measurement for all Special Pops? Nontrad seems outdated. 4. 3P1 is also focused on gender representation which doesn't seem to be in line with the state equity goals or what industry is asking for.	Thank you for your response. Perkins consortia determine, based on the results of the Comprehensive Local Needs Assessment, how reserve funding will be used in their CTE programs. As such, there is local control in determining how funds are used at the local level. Perkins legislation requires that reserve funding be used to foster innovation through the identification and promotion of promising and proven CTE programs, practices, and strategies; or to promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, high-wage, or in-demand occupations or industries. Regarding alignment of narratives and performance indicators, it's important to note

	that Narratives #1 through #9 are required by Perkins legislation to be included in the local application for funding. Performance indicators are also specified by legislation. Therefore, better alignment of narratives #1-#9 with performance indicators would require a change to the Perkins legislation. Please note that data can be disaggregated to determine performance by special population category.
Start time: 1/2/2024 12:42:34 PM; End Time: 1/2/2024 1:03:34 PM; School leader (College Administrators, Secondary Administrators, etc.); Page 28: "Creating more opportunities for secondary teachers to meet the CTE and work-based learning (WBL) licensure and certification requirements." Suggest striking "and certification requirements" as there are no such thing as CTE certifications in Minnesota, only licenses. Page 35: "Each student participating in an employer-aligned WBL opportunity must have a training plan prepared by the WBL coordinator and the employer ..." Suggest revising to indicate that the student is involved in the development of the training plan as well as that is best practice. Page 66: Numerator definition - consider including "completed one or more courses that include formal work-based learning prior to graduation" to better align with Perkins definition of WBL rather than rely on state program approval definition. In addition, in the current proposed definition, "concentrator" (at least 2 courses in since CTE program) calculation may conflict in definition (one or more WBL courses...) Page 71 - Reference to "USDOE" is the United States Department of Energy. Perhaps what is meant is "US ED?" Page 78 - "Perkins V is deeply rooted in partnerships between business/industry and education through	Thank you for providing this feedback. In response to your public comment, the following changes were made in the State Plan: Page 28—"Creating more opportunities for secondary teachers to meet licensure requirements for programs within CTE, including work-based learning. Page 35—"Each student participating in an industry-aligned WBL opportunity must have a training plan developed in collaboration with the WBL coordinator, student, and the employer... Page 71—References to "USDOE" were removed. Response to public comment regarding pages 66 and 78: Thank you for your thoughtful response. Although the details of the business rules are not provided, the current definition for the (5S3) Program Quality: Work-Based Learning indicator provided within the State Plan is fully aligned with the definition listed in federal legislation (Section 2(55)). With regard to CTE concentrators, our CTE concentrator definition requires a student to successfully complete 150 or more course hours within one career field in a state-approved CTE program. There is no conflict with a student becoming a CTE concentrator and also taking a work-based learning course, or with taking multiple work-based learning courses either separately or concurrently with other areas

work-based learning opportunities provided for students, which is so important that Minnesota has chosen Work-based learning (5S3) as our Perkins quality indicator." If this is true, it is even more reason to consider the Perkins definition of WBL and include all types of WBL experiences in the numerator definition on page 66.	of CTE concentration across the student's high school experience.
Start time: 1/7/2024 4:00:35 PM; End Time: 1/7/2024 4:23:29 PM; Faculty (College and University); School leader (College Administrators, Secondary Administrators, etc.); "Law enforcement" appears only once in the document and "police" and "policing" and "peace officer" appear nowhere at all. That is regrettable as (1) Minnesota State trains virtually all new Minnesota peace officers in its two-year and four-year Professional Peace Officer Education programs spread across the state, (2) one with any two-year or four-year undergraduate degree in any topic can take a policing Certificate program and be peace officer license-eligible in just one calendar year, (3) Minnesota law enforcement agencies are fighting a currently losing battle hiring new officers as recent high-profile police use of force situations have led to an exodus of existing officers from the profession, (4) poor business decisions are often made in troughs (such as where hiring rates are low and agencies are falling well short of optimum officer staffing levels - many schools, law enforcement agencies, and even the State Legislature have all reduced police education and minimum age requirements of late as a response to the trough in officer hiring - that is a miserable choice). (5) the Minnesota Peace Officer Standards and Training Board appears to be phasing out four-year police education programs (such as in Minnesota State schools)	Thank you for your comment. The Minnesota Perkins Plan supports all CTE careers that are high-wage, high-skill, and in-demand, including law enforcement. It's important to note that approximately 86 percent of Minnesota's graduates in law enforcement graduate from Minnesota State institutions. Decisions on funding for specific career pathways are made at the local level through Perkins consortia and are based on results from the Comprehensive Local Needs Assessment (CLNA). If local Perkins consortia determine that law enforcement is a priority in their region, they should be investing Perkins funding in those programs. Also, Minnesota State has developed a State Taskforce on Law Enforcement Education Reform-- https://www.minnstate.edu/le/index.html Please investigate the work being done by the taskforce—your concerns may be addressed there as well.

and focusing instead or focusing far more Page 5 of 7 on two-year officer training schools to rush young and inexperienced and immature 18-20 year-olds into sworn police service positions, (6) the MN POST Board and the State Legislature also seem to prefer a single monolithic police training program thus losing the advantages and creativity of maintaining diversity among programs and schools, and (7) most law enforcement agencies would love to hire and retain the diverse and disadvantaged and underrepresented students favored by this Perkins V plan. It is time to move law enforcement education to the top of the Perkins V priority list and save the four-year Minnesota PPOE schools to preserve expertise, creativity, and commitment to procedural justice for all.	

LOCAL APPLICATION AND CLNA TEMPLATES

[Local Application Template](#)

[CLNA Template](#)

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(OMB Control Number: 0970-0145)

Beginning July 1, 2024, multiple divisions of Children and Families Services, currently within the Department of Human Services, will transition to a newly created Department of Children, Youth, and Families (DCYF). Minnesota's TANF program, Minnesota Family Investment Program (MFIP) will be administered from DCYF effective July 1, 2024. Minnesota Statute Chapter 70, Children and Families, Article 12, Sections 1 – 35 outlines this statutory change.

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~~Effective March 1, 2024, U-Visa holders will be eligible for state-funded MFIP with a state-funded food portion. This is referenced in Section 44, section 256J.11, subdivision 1.~~

1. General Provisions

STATES THAT INCLUDE TANF IN THE COMBINED STATE PLAN MUST OUTLINE HOW THE STATE WILL MEET THE REQUIREMENTS OF SECTION 402 OF THE SOCIAL SECURITY ACT INCLUDING HOW IT WILL:

A. 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).

Minnesota Family Investment Program (MFIP)

The Minnesota Family Investment Program (MFIP), Minnesota's Temporary Assistance for Needy Families (TANF) program, provides temporary (60 months or less) cash and food assistance to:

- Families with children under age 18 (up to age 19 if in secondary education or vocational school full-time), and pregnant women with their spouses when financially eligible.
- Grandparents, aunts, uncles, cousins, or other relatives who take responsibility for children whose parents cannot or will not. These adult relatives may receive assistance through MFIP for children in their care and may choose to be on the MFIP grant or to apply for a child-only grant. When the non-parental caregiver receives assistance only for children, the income and assets of the relative caregivers are not considered and the case is not subject to the 60-month lifetime limit.

MFIP helps families work toward economic stability and greater self-sufficiency. MFIP provides help with childcare costs, employment services, opportunities for education and training for workforce preparation, and a grant to supplement family income. MFIP encourages employment by providing work incentives and promotes personal responsibility by expecting families to actively pursue employment. Some of the family's earned income is disregarded before calculating the MFIP grant. The monthly disregard amount is \$65 of earned income per wage earner plus 50 percent of the remaining earned income of the assistance unit. The remaining earnings are subtracted from the Family Wage Level grant standard, which is 10 percent higher than the standard allowed for families who receive only unearned income. For applicants, the Family Wage is the single standard used when determining MFIP eligibility regardless of if the applicant has earnings or not.

Childcare is a key component in Minnesota's strategy to help families leave and remain off public assistance. In Minnesota, the Child Care Assistance Program provides financial

assistance to families to support access to childcare that is affordable so that parents can work and/or attend school, and children are well cared for and ready for school. Minnesota Family Investment Program families who participate in work activities such as work, job search, education, or social services activities that are approved in their employment plans are eligible to receive childcare assistance. In addition, Transition Year childcare is available to eligible families for a full year after their MFIP case closes to help families move toward economic stability. MFIP childcare and Transition Year childcare assistance are fully forecasted in the state's budget.

The Basic Sliding Fee program is available for non-MFIP/~~DWP~~ income-eligible families and is funded through a capped allocation. If a family finishes their Transition Year childcare assistance and there is a waiting list in their county for the Basic Sliding Fee program, the Transition Year bridge program will continue to provide them childcare assistance until they reach their turn for Basic Sliding Fee childcare assistance.

Families receiving MFIP benefits and/or services are encouraged to apply for health care coverage at the same time they apply for MFIP. Families receiving cash assistance and those not receiving cash assistance can apply for the Medical Assistance program and the MinnesotaCare program (Minnesota's health care program for the uninsured). Families who receive MFIP must cooperate with their local child support agency to establish and enforce their child support orders. In federal fiscal year-2021, the child support program collected more than \$550 million in child support. Through the child support pass-through, the program collected and distributed to MFIP families more than \$9.7 million in child support. Minnesota passes through 100 percent of current child support payments made to the families receiving MFIP. Child support payments are treated as unearned income when calculating MFIP eligibility and benefits. Up to \$100 per month in child support payments for a family with one child, and up to \$200 per month for a family with two or more children is excluded from unearned income budgets when calculating a household's income for benefit determination.

MFIP combines cash and food benefits per the provisions of a waiver from the United States Department of Agriculture, Food and Nutrition Services. Families who are not eligible for MFIP can apply for the federal Supplemental Nutrition Assistance Program (SNAP).

Beginning March 2025, all MFIP grants are determined using prospective budgeting over a six-month period. Households must report required changes by the 10th of the month following the month of the change. Each MFIP unit will have a six-month review of their benefits, as well as a yearly recertification.

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Diversionary Work Program (DWP)

The Diversionary Work Program (DWP) is repealed from state statute as of March 1, 2026. Anyone who would have been eligible for DWP, will now be eligible for MFIP, so long as they meet all eligibility requirements.

The Diversionary Work Program provides help to families in crisis who are new to public assistance by supporting them in their efforts to immediately obtain and retain employment. DWP may be provided to families in crisis for a maximum of four months once in a 12-month period. Families with children under age 18 (up to age 19 if in secondary or vocational school full-time), or pregnant women and their spouses are eligible for DWP if they have not received cash assistance in the previous 12 months.

Eligibility for DWP begins the date a signed application form is received by the county agency. State statute requires financial workers to hold the interview for an applicant who appears to be eligible for DWP within five working days of the receipt of the application. If it appears that childcare is necessary to enable a parent to work or look for work, and the parent has not applied for childcare, the application for childcare assistance must be completed before the interview with the financial worker is completed.

As soon as possible, but no later than 10 working days before being notified by the county agency that the applicant is financially eligible for DWP, the employment services provider must meet with the applicant and develop an employment plan. The county agency must issue DWP benefits within one working day after receiving notice that an employment plan has been signed

DWP supports families during a crisis situation and is not intended to meet recurrent needs. The short-term supports provided may include temporary help with rent, utilities or other housing costs and a personal allowance. Other supports for which families might be eligible are Supplemental Nutrition Assistance Program, health care and childcare assistance. After four months of DWP, a family without a job or very low income may apply for MFIP. Families also may be eligible to continue Supplemental Nutrition Assistance Program, health care and childcare assistance.

Families who receive DWP are required to cooperate with their local child support agency to establish and enforce their child support orders. Although families on DWP are required to cooperate with their child support agency, child support is not assigned to the state. All child support is passed through to the family. Up to \$100 in child support payments for a family with one child, and up to \$200 for a family with two or more children is excluded from unearned income budgets when calculating a household's income for benefit determination.

DWP is a non-recurrent short-term benefit available for a maximum of four consecutive months. Because DWP benefits are meant to address the family's crisis and divert them from long-term assistance, receipt of DWP does not count against the 60-month TANF time limit.

B. 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).

Minnesota Family Investment Program (MFIP)

Caregivers must begin participating in work activities within 30 days of being determined eligible for MFIP. Counties have the option of requiring that work activities begin sooner.

MFIP uses a combination of work incentives and required work activities such as job search, short-term training, or subsidized work. Sanctions enforce work activity requirements and include grant reductions, vendor payments of shelter costs from the grant, and even case closure (when there are seven occurrences of noncompliance). When a case is closed, the financial worker re-determines the family's continued eligibility for the Supplemental Nutrition Assistance Program. MFIP must remain closed for a minimum of one full month when closed

for sanction reasons. Before ending a family's assistance, because of sanction, the county agency must review the case to determine if the employment plan is still appropriate and must attempt to meet with the participant face-to-face.

Diversionary Work Program (DWP)

The Diversionary Work Program (DWP) is repealed from state statute as of March 1, 2026. Anyone who would have been eligible for DWP, will now be eligible for MFIP, so long as they meet all eligibility requirements.

The goal of the Diversionary Work Program is to provide short-term, necessary services and supports to families, which will lead to unsubsidized employment, increased economic stability, and reduced risk of those families needing longer term assistance under MFIP. All parents, including both parents in a two-parent family, are required to develop and sign an employment plan before the family is approved for DWP. Most parents must seek full-time work immediately when approved. Employment services can help the family identify and address issues that may prevent the parents from obtaining or retaining employment. DWP employment service providers help parents find work that fits with the employment plan. The employment plan may include limited training that can be completed in four or fewer months.

Minnesota stresses work as the means to address the family's ongoing needs and places a high priority on starting to work or increasing the number of hours a person is employed. That is why the childcare application must be completed during the DWP interview process and why the applicant must develop an employment plan prior to receiving any cash benefits.

When a participant fails to comply with the DWP employment plan or with child support enforcement without good cause, the DWP case is closed. The family is not eligible for MFIP during the DWP disqualification period and the case remains closed unless the parent comes into compliance within the four consecutive months of the DWP eligibility period. The disqualification of the family from DWP does not affect receipt of Supplemental Nutrition Assistance Program or health care benefits.

C. 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.

Minnesota Family Investment Program (MFIP)

Minnesota ensures that parents receiving assistance through MFIP engage in work activities through three mechanisms: requiring all adults receiving MFIP assistance to develop an individualized employment plan that identifies the activities the adult will participate in and that meets the hours required for participation (~~256J.561, subd. 2~~142G.52 subd 1); imposing sanctions if the participant does not comply with the work requirements (~~256J.46~~142G.70); and offering employment services to all adults receiving assistance.

Minnesota requires parents and caregivers to submit pay stubs and documentation verifying participation in work activities as detailed in the State's Work Verification Plan. DCYF and DEED jointly operate MFIP employment and training services. DCYF also releases regular management indicator reports to counties in order for the counties to track state-mandated performance measures for MFIP.

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Childcare assistance is available to all MFIP participants who engage in work activities in an approved employment plan.

Minor caregivers under the age of 18 who have not received a high school diploma, or its equivalent are required to engage in appropriate educational programs and are provided with childcare assistance and supportive services to enable successful participation. Caregivers ages 18 and 19 can choose whether they want to complete their high school education or participate in work activities leading to employment. Whichever choice is made, childcare assistance is available to enable the parents to participate in the chosen activity.

Bilingual employment and training services and work literacy language programs may be available for those lacking English proficiency, although the lack of proficiency in English is not necessarily presumed to be a barrier to employment. Interpreter services are provided when necessary.

Diversionary Work Program (DWP)

The Diversionary Work Program (DWP) is repealed from state statute as of March 1, 2026. Anyone who would have been eligible for DWP, will now be eligible for MFIP, so long as they meet all eligibility requirements.

DWP stresses that work is the means for families to meet their ongoing needs and provides support services as needed to help participants in crisis obtain and retain employment. After establishing financial eligibility, participants must meet with an employment counselor and develop an employment plan in order to be found eligible to receive assistance through DWP. Work activities available for participants include, but are not limited to job search, job readiness assessment, job readiness assistance, job clubs, job counseling, job coaching, job skills training, work experience, subsidized employment, on-the-job training, job placement, educational programs, and post-employment follow-up services. Education for DWP recipients is allowed, but the education program must be completed within the four-month DWP period or an education activity cannot be approved as part of the employment plan. Participants who do not comply with their employment plans have their cases closed.

D. 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).

Minnesota Family Investment Program, and Diversionary Work Program and Work Benefit Program

Data on recipients is classified as private and may not be disclosed pursuant to Minnesota Statutes, Chapter 13. Access to Minnesota's eligibility computer system (MAXIS) is defined by a security role that is attached to a worker's ID, and access to information is defined and limited by worker job responsibilities. A personal logon ID cannot be issued until the worker completes a state-developed orientation course. The orientation includes a review of data privacy and ethics as they pertain to client information. All county, state and contracted

agency staff working in the Minnesota Family Investment Program must complete annually two data privacy courses designed to increase compliance with data practices and security and meet federal training requirements for all those with access to DCYF information and networks. Mastery of these courses is now required prior to receiving access to DCYF systems including the new eligibility system, MMIS, MAXIS and MEC2. In addition, printed reports distributed by the state are reviewed individually to ensure data provided to the requestor are appropriate for the recipient of the report.

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E. 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).

Minnesota's female population ages 15 to 44 in ~~2018-2023~~ was estimated at ~~1,074,005~~1,108,806. Of the total resident births (~~67,348~~61,715), ~~45,869~~41,782 were to married women, ~~21,467~~19,933 were to women who were not married, ~~and 12 were unknown~~. Thus, the out-of-wedlock birth rate in Minnesota for ~~2018-2023~~ was 32.3% for women ages 15 to 44. The out-of-wedlock birth rate in Minnesota for 2022 was 32.2%, 31.8% in 2021, 32.6% in 2020 and 32% in 2019. The out-of-wedlock birth rate for Minnesota has remained relatively stable over the last several years with a slight trend downward. Minnesota still continues to face significant challenges in trying to lower its out-of-wedlock birth rate.

~~20.0/1000 for women ages 15 to 44. The out-of-wedlock birth rate in Minnesota for 2017 was 20.6/1000, for 2016 was 21.3/1000, for 2015 was 21.3/1000, for 2014 it was 21.4/1000, and for 2013 it was 21.7/1000 women. The out-of-wedlock birth rate for Minnesota has remained relatively stable over the last several years with a slight trend downward. Minnesota continues to face significant challenges in trying to lower its out-of-wedlock birth rate.~~

Minnesota has focused significant attention on reducing unintended pregnancies, particularly those occurring to teens and young adults who are less likely to be married or prepared to care for a child. While Minnesota's teen pregnancy rate compares well to national rates, it masks significant and persistent racial and ethnic disparities. African American and American Indian youth are three to four times more likely to have a child when they are a teen than is a white youth. In an effort to address these disparities, the Minnesota legislature provided the Minnesota Department of Health (MDH) with \$2 million annually in TANF funds that support non-profit and government agencies in reducing the disparities in teen pregnancy rates in Minnesota.

Minnesota Department of Health receives \$999,106 annually in federal a Title V Abstinence Education Grant (AEGP) funding to support evidenced based efforts to delay sexual activity in youth. Minnesota's program is a coordinated countywide approach in St. Paul-Ramsey County, Hennepin County, Watonwan County, Beltrami County, and other rural and urban American Indian communities. The program has three components: direct service to youth in schools and community settings through Teen Outreach Program, *Making a Difference*, Project *AIM and Live it!* Curriculum; reaching out to parents in the community through *It's That Easy: A Guide to Raising Sexually Healthy Children* Parent Education Training; and the *Making Authentic Connections* Program, which trains parents and others in making authentic connections in relationships with youth.

Minnesota Department of Health also receives a federal Personal Responsibility Education Program (PREP) grant (\$887,189 annually). The MN PREP sub-awardees serve male and female youth in the following target populations: the juvenile justice system; attending area learning centers (ALC); in or aging out of foster care; runaway and homeless; with HIV/AIDS; pregnant, mothers' and fathers' who are under 21 years of age; Lesbian, Gay, Bisexual,

Transgender and Queer/Questioning (LGBTQ); American Indians; youth experiencing racial and ethnic disparities; culturally underrepresented; out of school; at risk of being trafficked for commercial sexual exploitation; and residing in areas of high teen birth rates. The overarching goals of this program are to decrease teen pregnancies and STI rates among participating teens, focusing on ages 15-19, and to increase healthy youth behaviors and life-skills in teens 10-19 years of age. This is accomplished through the implementation of high quality, medically accurate and evidence-based programs. It also assists high-risk adolescents to successfully transition from youth to adulthood by providing supplemental adult preparation topics such as adolescent development, healthy life skills, healthy relationships, and financial literacy. This program is not funded by TANF dollars but supports the strategic approach to serve youth with various needs to increase healthy behaviors that help them reach their potential.

Efforts are also directed at increasing access to family planning services for individuals who are low-income and at high risk for unintended pregnancies. Minnesota's Family Planning Special Projects (FPSP) grant program is administered by MDH. Funded through the state Legislature, the current two-year grant cycle made available \$12,706,000 (including \$2,312,000 in TANF funding) to 27 community family planning clinics across the state. Grantees include one county-operated clinic and one university-operated clinic, ten local public health agencies, and fifteen non-profit organizations. In State Fiscal Year 2017, FPSP provided family planning counseling services to 34,682 women, 6,468 men, and 109 client who identified as Transgender or Gender Nonconforming who were low-income and at risk for unintended pregnancy. FPSP grantees provided 30,813 men and women and those identified as Transgender or Gender Nonconforming with a contraceptive method – 24 percent of whom were age 19 or younger. To assist individuals in accessing subsidized family planning services, Minnesota Department of Health also funds a 1-800 family planning hotline. In State Fiscal Year 2017, the hotline responded to 3,600 inquiries.

Federal Title X funds totaling \$3.1 million comes to Minnesota through direct grants to Planned Parenthood of Minnesota, North Dakota and South Dakota, and Ramsey Public Health. Access to subsidized family planning services has also been increased through the Minnesota Family Planning Program. The Minnesota Family Planning Program (MFPP) increases access to family planning services for low-income Minnesotans and helps reduce the number of unintended pregnancies. The program is available to people who are not enrolled in Medical Assistance. In 2016, the program served more than 21,000 people, with a monthly average enrollment of about 12,000. Total spending for the program was just over \$9 million. Federal Medicaid funding for most services is at a 90-percent matching rate. The MFPP was implemented beginning July 1, 2006, as a federal waiver demonstration project approved by the Centers for Medicare & Medicaid Services (CMS). The Affordable Care Act (ACA) established a new Medicaid eligibility group and the option for states to provide family planning services under the Medicaid State Plan. The 2014 Minnesota Legislature directed DCYF to seek federal authority to operate the MFPP under the Minnesota Medicaid State Plan. Effective January 1, 2017, the MFPP became a Medicaid State Plan program.

Other state efforts supporting reducing unintended pregnancies include The Family Home Visiting Program administered by MDH. Approximately \$8 million in federal TANF funds are directed to the Family Home Visiting Program. The Family Home Visiting program administered by MDH provides funding to all of Minnesota's local public health agencies and to nine of the 11 tribal governments to support home visiting services to families at or below 200 percent of poverty. The goal of the program is to prevent child abuse and neglect, reduce juvenile delinquency, promote positive parenting and resiliency in children and promote family health and economic self-sufficiency. The program has a strong focus on providing family supports that reduce the risk of teen pregnancies and working with pregnant or parenting teens to delay subsequent pregnancies.

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These family home visiting efforts are augmented by receipt of approximately \$9.2 million (FFY18) in federal Maternal, Infant, and Early Childhood Home Visiting Program funds. Beginning in July 2019, a total of \$18.7 million in Minnesota state funding will support implementation of the evidence-based home visiting models such as Nurse Family Partnership, Healthy Families America and Family Spirit, Parents as Teachers and Family Connects.

F. 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).

The state of Minnesota considers sexual violence, including statutory rape, a public health problem. Sexual violence is defined as any of the following conditions: statutory rape, date/acquaintance rape, same-sex assault, child sexual abuse, incest, pornography, prostitution, sexual exploitation by professionals, stalking, sexual harassment, and any other sexual activity in which a person is forced, coerced, or manipulated without her/his consent. In order to address this problem, the state passed provisions that outline consequences for sexual violence including age of consent laws (for further details, see Minnesota Statute 609.342 at <https://www.revisor.mn.gov/statutes/?id=609.342>)

In addition, statewide partnerships approach sexual violence in a holistic manner that work towards the elimination of violent sexual behaviors including statutory rape. These efforts are provided under the leadership of a statewide stakeholder workgroup involving the following organizations and grassroots advocacy entities:

- Minnesota Department of Health (MDH)
- Minnesota Department of Human Services (DHS)
- Department of Corrections (DOC)
- Representatives of county and local legal, health, law enforcement and abuse prevention organizations and workgroups
- MDE and representatives of local school districts
- Minnesota Coalition Against Sexual Assault
- The MN Men's Action Network (Alliance to Prevent Sexual and Domestic Violence)
- Department of Children Youth and Families (DCYF)

These statewide public/private collaborative efforts support and fund annual conferences, periodic meetings, and ad hoc taskforces to shape the development of sexual violence prevention curriculum that is available and distributed to communities, youth, and professionals. To this end, a collaborative effort between MDH, Men as Peacemakers in Duluth and the Gender Violence Institute in Clearwater had been created to develop a network of men and male leaders involved in primary prevention practices. These efforts are currently coordinated by Minnesota Department of Health, the Bush Foundation, and the Minnesota Department of Public Safety.

G. 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).

The State of Minnesota has taken several steps to ensure the requirements of Section 4004 of the Middle-Class Tax Relief and Job Creation Act of 2012 are as follows:

- (a) Enforcing a complementary state law (MN Statute 256.987, Subdivision 2) which prohibits the purchase of tobacco products and liquor with any EBT transactions in specific prohibited spaces, Minnesota developed an EBT brochure that carries this warning: ***"It is illegal for an EBT user to buy or attempt to buy tobacco products or alcoholic beverages with the EBT card. If you do, it is fraud, and you will be removed from the program. Do not use an EBT card at a gambling establishment or at a retail establishment that provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state."*** Minnesota also developed plain language brochures that explain how to access benefits through an EBT card or EFT so clients can choose which option works for them. These brochures provide guidance and resources for applicants and recipients on how to access and how to problem-solve by calling toll-free phone numbers anytime they encounter access issues no matter where they live across the state.

Families and individuals have an option to access their benefits either as a direct deposit or EBT so they can meet their basic needs. These basic needs include food, shelter, clothing, utilities, and transportation. These funds are given either as direct deposit or until families and individuals can support themselves. Furthermore, counties/tribes that deliver MFIP/TANF benefits and services are instructed to communicate to all program participants state expectations around EBT card use restrictions at both application and at recertification stages.

- (b) A search is done quarterly through the EBT Data Warehouse system, specifically narrowed to include search fields of retailer name and/or Point of Sale machine names, and location of retailers that clients should not be accessing their cash benefits at. The results are further reviewed to see if the cash withdrawal transactions are done at a retailer that has an assigned Food and Consumer Services (FCS) number that indicates they are a registered retailer with US Food and Nutrition Service (FNS). The results without a FCS number affiliated with the retailer/Point of Sale machine are submitted to Fidelity National Information Services, Inc. (FIS) to review further and block ongoing cash withdrawals if possible. The known locations are reviewed monthly to see if they have been successfully blocked for usage.
- (c) Ongoing monitoring occurs by generating quarterly reports. Prohibited retailers and POS machines are continuously identified and blocked as needed.
- (d) Findings of noncompliance at the retailer level are resolved by blocking the ability to conduct EBT transactions. At the participant level, findings of non-compliance are addressed through fraud investigations at the county level who have the ability to prosecute such offenses for fraud and unlawful EBT use. The disqualification of the EBT cardholder from the program he/she was participating may also occur.

H. 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).

While there are client restrictions regarding EBT access and use of TANF benefits, Minnesota is required by federal law to ensure that applicants and recipients are provided adequate access to cash assistance with minimal or no fees or charges for withdrawal. Clients pay electronic fees similar to non-TANF clients. Clients get four free EBT cash withdrawals per month, and eFunds then charges \$1 for subsequent cash withdrawals. This fee is not charged until the client's fifth cash withdrawal. Clients are given the EBT Training Brochure by county workers and/or County Card Issuers (DHS-3315A). Furthermore, if clients request training in addition to the brochure, counties provide an EBT training video to walk clients through the process.

2. SPECIAL PROVISIONS

I. INDICATE WHETHER THE STATE 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)

To be eligible for MFIP ~~or DWP~~, an assistance unit must have established residency in Minnesota. An assistance unit is considered to have established residency in Minnesota when a child or caregiver has resided in this state for at least 30 consecutive days with the intention of making the person's home here and not for any temporary purpose. A county must waive the 30-day residency requirement when unusual hardship would result from denial of assistance. Families that have move from other states to Minnesota, and who establish state residency, are treated the same as all the other MFIP participants.

J. 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)

Persons who are either United States citizens or qualified non-citizens are eligible for TANF benefits per the provisions of section 431 of the PRWORA, as amended (8 U.S.C. 1641) if they meet all other program eligibility criteria. Qualified non-citizens who entered the United States before Aug. 22, 1996, are considered to be eligible for federally funded cash assistance if they are Lawful Permanent Residents (LPRs); paroled for one year or more; victims of battery and/or cruelty; or conditional entrants prior to April 1, 1980. Qualified non-citizens who entered on or after Aug. 22, 1996, are considered to be ineligible for federally funded MFIP ~~DWP~~ cash assistance for five years. The following non-citizens may be eligible for federal funding without considering the date of admission to the U.S. if they meet all other program requirements: refugees, asylees, veterans and persons on active duty in the U.S. Armed Forces, their spouses or unmarried dependent children, non-citizens whose deportation/removal is being withheld, Cuban or Haitian entrants and certain Amerasians.

All lawfully residing non-citizens who are not eligible for federal funding may be eligible for state funding if they meet other program eligibility requirements for state funded cash assistance. LPRs age 18 through 69 who are funded under state dollars and who have been in the country for four or more years must meet one of the following requirements to remain eligible: Enrollment in literacy, English as a second language or citizenship classes; applied for admission to such classes and on a waiting list; applied for a waiver from U.S. Citizenship and Immigration Services (USCIS) of the English language or civics requirements of the citizenship test; submitted an application for citizenship to USCIS and waiting for a testing date or swearing-in ceremony; or have been denied citizenship due to failure to pass the test after two or more attempts or because of an inability to understand the rights and responsibilities of becoming a U.S. citizen as documented by the USCIS or the county agency.

K. 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).

Eligibility

An applicant for MFIP ~~or for DWP~~ must meet the eligibility requirements specified in Minnesota Statutes Sections ~~256J.04142G.01~~ through ~~256J.05142G.90~~ before receiving benefits and services. All requirements under Section 408 of the Social Security Act, as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, are included in Minnesota law.

Assistance is provided equitably to all program recipients in accordance with state and federal law. ~~Neither MFIP nor DWP does not~~ requires basis of eligibility tests, such as the previous Aid to Families with Dependent Children 100-hour rule requirement for two-parent families.

The asset limit for both programs is \$10,000 for applicants and \$10,000 for participants. One vehicle per assistance member age 16 or older is not counted towards the asset limit. Other assets that do not count towards the asset limit include personal goods and savings in a tax-free ABLE account, up to \$14,000 per year. For MFIP ~~and DWP~~, statewide payment standards are based on the number of eligible persons in the assistance unit.

Persons convicted of a drug offense committed after July 1, 1997 may receive cash assistance subject to the conditions set forth in Minnesota Statutes ~~256J.26142G.18~~.

Minnesota Family Investment Program (MFIP)

Time Limits

There is a 60-month lifetime limit for receiving MFIP assistance with exceptions in certain situations. Time limit exceptions apply to the months in which individuals are living in Indian country (as defined in Section 1151 of Title 18, U.S.C.) or a Native Alaskan Village where the not-employed rate is over 50 percent per the provisions under 45 CFR 264.1((b)(1)(ii)).

Under the MFIP program, some families are funded with segregated state funds and are exempt from the 60-month lifetime limit. Included are caregivers age 60 and over

as well as minor caregivers under the age of 18 and caregivers 18 or 19 who are complying with education requirements. The months a person received cash assistance as part of the MFIP field trials are also exempted from the 60-month time limit.

Hardship Extensions

Extensions of the 60-month time limit are possible if any of the following hardship conditions are met:

- The participant is suffering from an illness, injury or incapacity which has been certified by a qualified professional when the illness, injury or incapacity is expected to continue for more than 30 days, and severely limits the participant's ability to obtain or maintain suitable employment.
- The participant is a caregiver whose presence in the home is required because of an illness, injury or incapacity of another member in the assistance unit, a relative in the household, or a foster child in the household when the illness or incapacity and the need for a person to provide assistance in the home has been certified by a qualified professional and is expected to continue for more than 30 days.
- The participant is a caregiver with a child or an adult in the assistance unit who meets the disability or medical criteria for home care services or waived services or meets the criteria for severe emotional disturbance under Minnesota statutes.
- The participant is a caregiver who is employed the number of hours required by DCYF with a household income that does not exceed program standards.
- The participant is determined to be hard-to-employ because the individual belongs to any of the following groups:
 - A person diagnosed by a qualified professional as a person with developmental disability or mental illness, and the condition severely limits the person's ability to obtain or maintain suitable employment.
 - A person assessed by a vocational specialist or the county agency to be unemployable.
 - A person assessed to have an IQ below 80 assessed by a vocational specialist or a county agency to be employable, but the condition severely limits the person's ability to obtain or maintain suitable employment.
 - A person who is determined by a qualified professional to be Learning Disabled and the condition severely limits the person's ability to obtain or maintain suitable employment. The initial approval of a learning disability extension must have been or confirmed within the previous 12 months. Learning disabilities do not include learning problems that are primarily the result of visual, hearing or motor handicaps, mental retardation and emotional disturbance or due to environmental, cultural or economic disadvantage.

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- A person assessed to have an IQ below 80 assessed by a vocational specialist or a county agency to be employable, but the condition severely limits the person's ability to obtain or maintain suitable employment.
- A person who is determined by a qualified professional to be Learning Disabled and the condition severely limits the person's ability to obtain or maintain suitable employment. The initial approval of a learning disability extension must have been or confirmed within the previous 12 months. Learning disabilities do not include learning problems that are primarily the result of visual, hearing or motor handicaps, mental retardation and emotional disturbance or due to environmental, cultural or economic disadvantage.

Appeals

Applicants and recipients of MFIP ~~and DWP~~ are notified in writing of their rights and the process to follow to secure a fair hearing. When an applicant is denied services, or a participant disagrees with a county or tribal agency decision, the applicant or participant may submit a request for a hearing to the county or tribal agency or directly to the DHS Appeals Office. State Human Services judges will conduct a hearing in person at the county office or by telephone. Decisions are issued by the Commissioner within 90 days of the request for a hearing. Under certain conditions, a participant may continue to receive benefits pending an appeal decision. Reasonable expenses incurred by a recipient because of the appeal are reimbursed upon request (Minnesota Statute 256.045, Administrative and Judicial Review of Human Services Matters).

L. NO LATER THAN ONE YEAR AFTER THE DATE OF ENACTMENT OF THIS ACT, UNLESS THE CHIEF EXECUTIVE OFFICER OF THE STATE OPTS OUT OF THIS PROVISION, THE STATE SHALL REQUIRE A PARENT OR CARETAKER RECEIVING TANF ASSISTANCE FOR TWO MONTHS, WHO IS NOT EXEMPT FROM THE WORK REQUIREMENTS AND IS NOT ENGAGED IN WORK, TO PARTICIPATE IN COMMUNITY SERVICE EMPLOYMENT.

Minnesota continues to opt out of the provision that requires parents and caregivers who have received TANF assistance for two months and who are not working to participate in community service employment.

M. GIVE A DESCRIPTION OF THE STRATEGIES AND PROCEDURES IN PLACE IN MINNESOTA TO ENSURE THAT VICTIMS OF DOMESTIC VIOLENCE RECEIVE APPROPRIATE ALTERNATIVE SERVICES. THE STATE MUST DESCRIBE HOW IT:

- *Screens and identifies individuals receiving TANF and MOE assistance with a history of domestic violence while maintaining confidentiality of the individuals;*
- *Refers the individuals to counseling and supportive services, and*
- *Provides waivers, pursuant to a determination of good cause of normal program requirements for as long as necessary where compliance would make it more difficult to escape domestic violence.*

Minnesota has adopted the Family Violence Option under Subpart B of part 260 that meets the requirements at 260.52(c) and 260.55 for a federally recognized good cause domestic violence waiver. At application for cash benefits, recertification, and when referred to employment services or child support, MFIP ~~and DWP~~ clients are provided with a self-administered screening form which allows them to self-disclose domestic abuse. This form also includes referral information about how to seek help from the county clients who apply for the family violence waiver must offer one of five forms of documentation verifying the abuse (~~256J-545142G.53~~). Counties must have staff trained in domestic violence matters available to help develop and review employment plans for applicants and recipients claiming the domestic violence waiver. Those employment plans must be developed to ensure the safety of the parent and children. If there are any disagreements about the contents of the employment plan, the client must be able to receive assistance from a person trained in domestic violence advocacy. Any activities that the advocate identifies as appropriate must be included in the plan.

The Domestic Violence Employment Plan is reviewed at least every six months or more often if appropriate. A participant may be granted a "good cause" exemption from cooperating with child support based on documentation of domestic violence if the pursuit of child support is likely to place the person at risk of further abuse.

N. CERTIFICATION THAT THE STATE WILL PROVIDE INFORMATION TO VICTIMS OF SEXUAL HARASSMENT OR SURVIVORS OF DOMESTIC VIOLENCE, SEXUAL ASSAULT, OR STALKING (Section 402 (a) (8) OF THE SOCIAL SECURITY ACT) –

(A) In general. A certification by the chief executive officer of the State that the State has established and is enforcing standards and procedures to:

(i) Ensure that applicants and potential applicants for assistance under the State program funded under this part are notified of assistance made available by the State to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking;

(ii) Ensure that case workers and other agency personnel responsible for administering the State program funded under this part are trained in:

(I) the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking;

(II) State standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment, or survivors of domestic violence, sexual assault, or stalking; and

(III) Methods of ascertaining and ensuring confidentiality of personal information and documentation related applicants for assistance and their children who provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking; and

Minnesota's current application form (The Combined Application Form) contains language to inform all applicants and potential applicants to talk to their case worker if in danger from situations of domestic violence, sexual harassment or stalking. It also includes guarantees of confidentiality. In addition, at the interview stage, workers are

trained to explain to the applicants good cause exemption from program rules and resources that are available for families and children in their situation via written information that includes how to get help and how their information will be kept confidential.

All workers who directly work with applicants must take a state designed and delivered training that covers the nature and dynamics of sexual harassment and domestic violence, sexual assault and stalking. This training content is also offered on demand and at state conferences as appropriate. The content includes the policy and rules that govern family violence, sexual harassment or stalking requirements, associated long-term risks, available community resources, and an explanation of the state expectations for ensuring that such families are afforded good cause options and find support to overcome the barriers they face as they try to put behind them the social and economic burdens they face as a result of domestic violence, sexual harassment and stalking. Details of the specific process and guidance on how to serve and support applicants and recipients in these situations is also listed in the Minnesota TANF employment services manual.

Furthermore, Minnesota provides Safe At Home (SAH) Program, which is a statewide address confidentiality program that assists survivors of domestic violence, sexual assault, stalking and others who fear for their safety by providing a substitute address for people who move or are about to move to a new location unknown to their aggressors.

O. 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.*

Minnesota intends to assist individuals in training, seeking and maintaining employment as a result of the Patient Protection and Affordable Care Act of 2010 (ACA). Minnesota uses its Pathways to Prosperity program initiatives to create career pathways programs in high-demand career fields. The Pathways to Prosperity program provides grants to local partners to operate as part of the state's employment services system. Funding is available to low income families on MFIP to assist with compliance with their work requirements.

At the end of the training, MFIP participants are considered to be work ready for the Universal Health Care classification that allows entry to local long-term care facilities as Certified Nurse Assistants with a focus on elder care. While in training, participants are considered Adult Basic Education (ABE) students. Allowable work activities focus on retention by reducing barriers to successful employment once the training is complete. The lead state agencies in the Pathways to Prosperity program initiative include the Minnesota

State Colleges and Universities, Minnesota Department of Education Adult Basic Education Office, and Minnesota Department of Employment and Economic Development. Other key state level collaborators include Minnesota Department of Human Services, Minnesota Department of Labor and Industry, the Office of Higher Education, Greater Twin Cities United Way, Minnesota Workforce Council Association, and the Governor's Workforce Development Council.

ERRATUM

Minnesota had a public comment period that ended on October 27, 2022. The date on the signature page is in error and is updated.

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. IF A STATE AGENCY PLANS TO OFFER SUPERVISED JOB SEARCH IN ACCORDANCE WITH PARAGRAPH (E)(2)(I) OF THIS SECTION, THE STATE AGENCY MUST ALSO INCLUDE IN THE E&T PLAN A SUMMARY OF THE STATE GUIDELINES IMPLEMENTING SUPERVISED JOB SEARCH. THIS SUMMARY OF THE STATE GUIDELINES, AT A MINIMUM, MUST DESCRIBE: THE CRITERIA USED BY THE STATE AGENCY TO APPROVE LOCATIONS FOR SUPERVISED JOB SEARCH, AN EXPLANATION OF WHY THOSE CRITERIA WERE CHOSEN, AND HOW THE SUPERVISED JOB SEARCH COMPONENT MEETS THE REQUIREMENTS TO DIRECTLY SUPERVISE THE ACTIVITIES OF PARTICIPANTS AND TRACK THE TIMING AND ACTIVITIES OF PARTICIPANTS;

The following is a list of activities provided under Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T). Current budgeting doesn't identify expenses by these categories.

Some areas of the state have a shortage of remedial education funds. In other areas, specialized programs have been established to service SNAP E&T populations. Minnesota is quite generous in supporting federal ABE funds. Even with state support, the influx of welfare reform has created a burden on resources and staff in some areas and in serving high-barrier populations

thus any SNAP E&T funds are supplementing, not supplanting federal, state, or local funds. Minnesota only allows reimbursement for ABE/GED services provided to participants aged 21 or over. These services must be substantially differentiated from those already provided by existing education programs currently being offered at no cost to the general public. If these services are provided to persons other than E&T participants, the costs charged to E&T must be the same.

Component	Definition
Non-Education/Non-Work	Supervised Job Search (SJS)- An activity in which the participant is primarily engaged in actively applying for work, building connections with prospective employers, and/or attending hiring events and other networking opportunities. Supervised job search activities must have a direct link to increasing the employment opportunities of individuals engaged in the activity. Participants may conduct these activities at any location appropriate to the activity, including, but not limited to their home, job sites, public facilities, or their SNAP E&T provider locations. Providers must attempt to make contact with the participant at least once per week, and must successfully make contact at least once per month in order to continue participation in this activity. Providers must retain a summary of job search activities performed (including activity type, positions applied for or follow-up steps taken (if any), and any application barriers that may have arisen). Providers must establish, in consultation with the participant, individual goals for the number of applications or contacts made each month. This standard should take into account the participant's location and barriers. Providers must demonstrate through case notes or other means that they have engaged in regular meaningful communication with the participant about their job search. Supervised Job Search focuses on searching for and applying for jobs with direct supervision and is not intended to be a long-term activity. For a time-limited participant: Supervised Job Search and Job Search Training are not countable activities unless they make up less than 50% of the required 80 hours per month. If combining

Component	Definition
	Supervised Job Search or Job Search Training in order to meet the work requirement, 51% or more of the time must be spent in: • A SNAP E&T activity other than Supervised Job Search or Job Search Training • Title I of the Workforce Innovation and Opportunity Act (WIOA) • The Trade Adjustment Assistance program • A program of employment and training for veterans operated by the Department of Labor or the Department of Veterans Affairs (this does not include Jobs for Veterans), • Paid employment • Volunteering Since this activity alone does not meet the work requirement for time-limited recipients, hours do not need to be recorded for this activity unless it is combined with another source of countable hours, such as employment or education. If the plan is to combine activities to earn additional

Component	Definition
	months of benefits, this must be reflected in the EP and case noted. Job Search Training (JST)- An activity that strives to enhance the job search skills of participants by providing instruction and mentoring in job seeking techniques, increasing motivation and self-confidence for work, and understanding employer needs. Job search training activities are approvable if they directly enhance the employability of the participants. A direct link between the job search training activities and job readiness must be established. The activity may consist of employability assessments, job placement services, one-on-one case management to reduce employment barriers, application assistance, and training in aspects of the job search process including resume writing, interviewing, appropriate dress, social skills, and using job search technology. Job Search Training is not intended to be a long-term activity. For a time-limited participant: Supervised Job Search and Job Search Training are not countable activities unless they make up less than 50% of the required 80 hours per month. If combining Supervised Job Search or Job Search Training in order to meet the work requirement, 51% or more of the time must be spent in:

Component	Definition
	• A SNAP E&T activity other than Supervised Job Search or Job Search Training • Title I of the Workforce Innovation and Opportunity Act (WIOA) • The Trade Adjustment Assistance program • A program of employment and training for veterans operated by the Department of Labor or the Department of Veterans Affairs (this does not include Jobs for Veterans), • Paid employment • Volunteering Since this activity alone does not meet the work requirement for time-limited recipients, hours do not need to be recorded for this activity unless it is combined with another source of countable hours, such as employment or education. If the plan is to combine activities to earn additional months of benefits, this must be reflected in the EP and case noted.

Component	Definition
	Workfare (W) - A work activity in which Supplemental Nutrition Assistance Program (SNAP) recipients perform work in a private or public non-profit agency as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly benefit allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Workfare assignments cannot replace or prevent the employment of regular employees and assignments must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours. The maximum number of hours of work each month is determined by dividing the household's SNAP benefit allotment by the federal or state minimum wage, whichever is higher (in Minnesota, the higher state minimum wage of large employers must be used). The county or tribal human services office, or Employment Services Provider (ESP) must round the number of hours arrived at through this computation down to the next full hour. For time-limited participants, the work requirement is considered to be met when the maximum number of hours are obtained. This activity requires the provider to enter into a worksite agreement which specifies days/hours of work and responsibilities of the participant and supervisor. Self-Employment Training (SET)-

Component	Definition
	An activity that improves the employability of participants by providing training in setting up and operating a small business or other self-employment venture. Participants receive technical assistance in developing business plans and in creating financial marketing Job Retention (JR)- Services provided to SNAP E&T participants who have secured employment after participating in another E&T activity; only individuals who have received other employment and/or training services under the E&T program are eligible for job retention services. Individuals must have received SNAP benefits in the month of or the month prior to starting job retention services. This activity is meant to help participants who have secured employment achieve satisfactory performance, retain employment, or to increase earnings over time. Such services and reimbursable participant costs may include, but are not limited to: • Case management • Life skill classes • Referrals to other services • Dependent care assistance • Transportation assistance • Clothing required for the job • Equipment or tools required for the job

Component	Definition
	• Test fees • Union dues • Licensing and bonding fees Individual circumstances may warrant job retention services that begin at various times, such as on the day a job offer is accepted, the day the individual reports the information to their E&T case manager, the first day of the job, or other time based on the availability and type of services. Retention services must be provided for a minimum of 30 days, but not more than 90 days. The provider may identify when the 90 days of job retention services start, however, the household must have been receiving SNAP in the month of or the month prior to beginning job retention services. Job retention services are available to a participant for each new job or promotion the individual obtains, as long as the improvement was gained as a result of participation in SNAP E&T. For example, if a person gains employment through a new job, receives 90 days of job retention services, and then later finds a different job, they would generally not be eligible for a new 90-day period of job retention services. However, if the individual re-engaged in SNAP E&T services and then gains new employment, they would be eligible for additional job retention services. There may be circumstances where a person participates in job search, gains employment and receives 30 to 90 days of job retention services. This person may later reengage with SNAP E&T after a job loss to search for work or obtain career or technical training to find a better job and could qualify for an additional 90 days of job retention services.
Educational Programs	Basic Education and/or Foundational Skills Instruction (EPB)- Programs that offer academic instruction and education services below the post-secondary level that increase an individual's ability to read, write, and perform mathematics or other activities necessary for the

Component	Definition
	attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. Such programs include Adult Basic Education (ABE), basic literacy, and high school equivalency (GED). Career and/or Technical Education Programs or Other Vocational Training (EPC)- Organized activities at the post-secondary level that provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and for careers in current or emerging employment sectors. Programs are primarily designed for those who are beyond the age of compulsory high school attendance. Ideally, such programs should be employer-driven and lead to industry-recognized certificates or credentials. Post-secondary training is limited to a 2-year associate degree level or lesser and may not include a 2-year associate degree intended for transfer into a 4-year degree program or any other additional educational program, such as an Associate of Arts. Classroom training and educational activities may be included in an EP, but are limited to a 2-year associate career or technical degree or lesser. This may include prerequisite courses (other than a remedial course which may be considered basic education and/or foundational skills instruction) that meet the requirements of a career or technical education program. For a post-secondary education program to be approved, the ESP must ensure that: • The goals in the participant's EP could be met with the post-secondary training. • There is a market for employees with the proposed training where the participant will (or is willing to) reside upon completion of the program. • The participant can meet the requirements for

Component	Definition
	admission into the program. • There is a reasonable expectation that the participant will complete the training program based on such factors as their current assessment, previous education, training, work history, current motivation, and circumstances. English Language Acquisition (EPEL)- Designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language. Integrated Education and Training (EPIE)/Bridge Programs- Programs that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or group of occupations for the purpose of educational and career advancement. IET/Bridge programs are designed to build the foundational skills of people whose academic abilities do not meet the minimum requirements of a traditional post-secondary degree or certificate program. IET/Bridge programming provides enhanced support and programming for people through contextualized foundational instruction. For example, for a participant entering a Certified Nursing Assistant (CNA) program, the reading instruction would be focused on healthcare terms and vocabulary. There may be an ABE/ESL/ELL instructor in the classroom teaching alongside the CNA instructor. Work Readiness Training (EPWRT)- Intensive programs that include skill assessment and educational remediation services that prepare individuals for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information,

Component	Definition
	problem solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline. Work readiness training includes intensive programs that include skill assessment and educational remediation services that prepare people for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance a person's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline. Work readiness training is intended to increase employability, but does not result in a recognized credential.
Work Experience	Work Activity (WA)- An activity that provides a person with an opportunity to acquire the general skills, knowledge, and work habits necessary to obtain employment in exchange for SNAP benefits. The purpose of work activity is to improve the employability of those who cannot find unsubsidized full time employment. A work activity can be arranged within the private for-profit sector, the non-profit sector, or the public sector whereas workfare must take place at a public or private non-profit institution. Work activity is a training program and should have clearly defined learning goals, such as a curriculum, clearly articulated outcome goals, intentional day-to-day activities that are designed to improve someone's skills and employability, and a planned start date and end date.

Component	Definition
	Households that include work activity participants may not work more hours monthly than the total obtained by dividing the household's monthly SNAP allotment by the higher of the applicable Federal or State minimum wage (in Minnesota, the higher state minimum wage of large employers must be used). The ESP must round the number of hours arrived at through this computation down to the next full hour. Unlike workfare, participating in this activity for the maximum amount of hours may not meet the work requirement for time-limited participants; these individuals may need to do additional activities in order to meet the 80 hour per month requirement. Work-Based Learning, On-the-Job Training (WBLOJT)- A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. Through the on-the-job training (OJT) contract, occupational training is provided for the participant in exchange for the reimbursement, typically up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and supervision related to the training. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan. Wages are reimbursed at a set percentage by the organization to the employer for the length of the contract. OJT also carries the expectation that the participant will be hired by the employer in a permanent position when the contract ends. Work-Based Learning, Pre-Apprenticeship (WBLPA)- Training and curriculum based on

Component	Definition
	industry standards, approved by the employer operating the apprenticeship program (typically referred to as a program sponsor). This includes education and pre-vocational services that prepare participants to meet the minimum qualifications for entry into a registered apprenticeship program. Pre-Apprenticeship programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program and should be directly linked to an apprenticeship program. Work-Based Learning, Apprenticeship (WBLA)- A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation that provides the industry-specific knowledge needed to perform highly skilled work. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations Work-Based Learning, Internship (WBLI)- A planned, structured learning experience that takes place in a workplace for a limited period of time. An internship must be a learning experience that applies knowledge gained in the classroom, and teaches skills or knowledge that can be transferred to other employment settings. An internship has a defined beginning and end, and a job description with desired qualifications. Internships may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act (FLSA). An internship may be arranged within the private for profit sector, the non-profit sector, or the public sector. Work-Based Learning, Transitional Jobs (WBLTJ)- A transitional job is one that provides a work experience for a limited period of time,

Component	Definition
	that is wage paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment.
Other Activities	Employability Assessment- Employability assessments are mandatory for all participants. The purpose of an Employability Assessment is to collect and evaluate information to identify a participant's employment goals, barriers, and support service needs. The information collected from this assessment is the basis for the EP. The assessment must be completed prior to placement in an activity, and as often as necessary throughout the participant's engagement in the program. The assessment should consider: • The participant's literacy level (see NOTE below). • The participant's ability to communicate in the English language. • The participant's education and employment history. • The estimated length of time it will take the participant to obtain employment. • The participant's employment-related skills and abilities, barriers to employment, steps necessary to overcome the participant's barriers to employment and any special services needed to meet the participant's needs.

2. A DESCRIPTION OF THE CASE MANAGEMENT SERVICES AND MODELS, HOW PARTICIPANTS WILL BE REFERRED TO CASE MANAGEMENT, HOW THE PARTICIPANT'S CASE WILL BE MANAGED, WHO WILL PROVIDE CASE MANAGEMENT SERVICES, AND HOW THE SERVICE PROVIDERS WILL COORDINATE WITH E&T PROVIDERS, THE STATE AGENCY, AND OTHER COMMUNITY RESOURCES, AS APPROPRIATE. THE STATE PLAN SHOULD ALSO DISCUSS HOW THE STATE AGENCY WILL ENSURE E&T PARTICIPANTS ARE PROVIDED WITH TARGETED CASE MANAGEMENT SERVICES THROUGH AN EFFICIENT ADMINISTRATIVE PROCESS;

Minnesota requires that all SNAP E&T participants receive case management as part of their participation in SNAP E&T. Employment Services Providers (ESPs) are responsible for ensuring that participants receive case management services, including at least one of the following: employability and intake assessments, employment plans, barrier identification, progress monitoring, coordination with service providers, referral facilitation, and service application assistance. Providers are strongly encouraged to build and maintain relationships with a wide range of employment and social service providers in their area, and to offer referrals to those organizations if the need cannot be met from within. The ESP is still able to provide case management to assist participants in connecting to those referrals and managing their path to employment. As a result participants do not need a separate referral for case management and all services are coordinated with their SNAP E&T components by their SNAP E&T provider.

All case management activities are tracked in the participant's record and through monthly case notes in the state's case management system, Workforce One (WF1)

3. 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;

SNAP E&T Operating Budget for FFY 2024

Expense Category	Non-Federal Share	Federal Share	Total
I. Direct Program and Admin Costs			
Salary/Wages (State agency only)		\$439,130.00	\$439,130.00
Fringe Benefits		\$149,517.00	\$149,517.00
Non-capital equipment		\$35,000.00	\$35,000.00
Materials		\$10,000.00	\$10,000.00
Travel		\$10,229.00	\$10,229.00
Building Space			
Equipment and other capital expenditures			

Expense Category	Non-Federal Share	Federal Share	Total
<i>Subtotal - State agency costs only</i>		\$643,876.00	\$643,876.00
Contractual Costs	\$2,570,783.76	\$2,751,767.76	\$5,322,551.52
County and Tribal Nation Administered Program Admin Cost	\$418,603.50	\$798,946.50	\$1,217,550.00
Total Direct Program and Admin Costs	\$2,989,387.26	\$4,194,590.26	\$7,183,977.52
II. Indirect Costs:			
Indirect Costs			
III. In-kind contribution			
State in-kind contribution			
Total Administrative Costs	\$2,989,387.26	\$4,253,455.26	\$7,242,842.52
IV. Participant Reimbursements			
Dependent Care (including costs from contracts/partners and county or Tribal Nation administered programs)	\$1,000.00	\$1,000.00	\$2,000.00
Transportation & Other costs (including costs from contracts/partners and county or Tribal Nation administered programs)	\$616,083.00	\$649,583.00	\$1,265,666.00
State Agency Cost for Dependent Care			
Total Participant Reimbursements	\$617,083.00	\$650,583.00	\$1,267,666.00

Expense Category	Non-Federal Share	Federal Share	Total
V. Total Costs	\$3,606,470.26	\$4,904,038.26	\$8,510,508.52

4. 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;

Item	Description	Amount or Percentage
I.	Anticipated number of work registrants in the State during the Federal FY (unduplicated count):	140,000
II.	Estimated number of planned State option exemptions from E&T:	140,000
	List below planned State option exemption categories and the number of work registrants expected to be included in each during the Federal FY. 1. All work registrants	140,000
III.	Percent of all work registrants exempt from E&T	100%
IV.	Anticipated number of E&T mandatory participants	0
V.	Anticipated number of voluntary E&T participants	2,000
VI.	Anticipated number of ABAWDs in the State during the Federal FY24 (excluding the ones residing in waived area)	70,000
VII.	Anticipated number of ABAWDs in waived areas of the State during the Federal FY	10,000
VIII.	Anticipated number of ABAWDs to be exempted under the State's 10 percent ABAWD exemption allowance during FY24	25,000
IX.	Number of potential at-risk ABAWDs expected in the State during the Federal FY (line VI–VIII)	35,000

5. THE CHARACTERISTICS OF THE POPULATION THE STATE AGENCY INTENDS TO PLACE IN E&T;

Based on estimates from FFY23 SNAP E&T participation, the state expects to annually place:

Characteristic	Characteristic Detail	Percentage	Total Number
Voluntary vs. Mandatory	Voluntary Participants	100%	
	Mandatory Participants	0%	0
Education	Received high school diploma or equivalency (HSE) prior to participation in E&T	81.6%	1,490
	Did not receive HSE prior to participation	14.84%	271
	Unknown	3.56%	65
Race	White	964	52.79%
	Black or African American	521	28.53%
	Native American or Alaska Native	147	8.05%
	Asian	53	2.9%
	Hawaiian Native or other	3	0.16%
	Multi-Race	73	4.0%
	Hispanic or Latinx	10.19%	186
Ethnicity	Hispanic or Latinx	10.19%	186
	Hispanic or Latinx	10.19%	186
Speak English as a second language	Limited English Proficiency- Yes	6.96%	127
	Limited English Proficiency- No	93.04%	1,699
Gender	Male	761	41.86%
	Female	1,056	57.83%
Age	Between 18-21	195	10.68%
	Between 22-39	940	51.48%
	Between 40-54	515	28.2%
	55 or older	168	9.2%

Characteristic	Characteristic Detail	Percentage	Total Number
Disability Status	Yes, Employment Barrier	7.67%	140

6. THE ESTIMATED NUMBER OF VOLUNTEERS THE STATE AGENCY EXPECTS TO PLACE IN E&T;

Minnesota operates a voluntary SNAP E&T program and anticipates serving 2,000 participants in FFY24.

7. THE GEOGRAPHIC AREAS COVERED AND NOT COVERED BY THE E&T PLAN AND WHY, AND THE TYPE AND LOCATION OF SERVICES TO BE OFFERED;

Minnesota operates a voluntary SNAP E&T program and intends to offer services to all interested SNAP recipients who meet eligibility criteria. Many of the SNAP E&T components are available in most counties in Minnesota and the DCYFHS SNAP E&T team is working actively to increase the number and range of SNAP E&T providers in the state in rural counties. Where services are not available it is due to limitations of 100% funding and a lack of state-contracted providers. DCYFHS is actively seeking ways to expand the breadth and depth of SNAP E&T services statewide. In FFY24, Minnesota is wrapping two projects:

1. A rapid cycle evaluation project with USDA and Mathematica focused on boosting rural participation.
2. A three-year federally funded DATA Grant project with Seattle Jobs Initiative (SJI) and Third Sector Capital Partners (TSCP) with a priority of increasing program engagement and participation equitably (including cross-state).

The state plan covers all areas of the state.

8. THE METHOD THE STATE AGENCY USES TO COUNT ALL WORK REGISTRANTS AS OF THE FIRST DAY OF THE NEW FISCAL YEAR;

Work registrant data is gathered from the DHS Data Warehouse using Structured Query Language (SQL) developed and approved by FNS regional and national staff. County or Tribal Nation eligibility workers use work registration codes when approving SNAP eligibility in MAXIS on the STAT/WREG panel, and ESPs use WF1 to record participant level data and activities. The MAXIS codes meet federal exemption code definitions in 7 CFR 273.7.

Completing the FNS-583 Report:

Line 1: Count of all work registrants whose case was active on September 30th at midnight. This number provides an accurate count of those on board on October 1st. It does not include new applications processed on this date.

Line 2: Count of distinct persons by minimum report month where the report month is greater than the start of the FFY.

Line 3: Count of distinct persons with ABAWD status enrolled in a qualifying component where "Report Month" is equal the 1st month of quarter, the 2nd month of the quarter and the 3rd month of quarter.

Line 4: Count of distinct persons with ABAWD status enrolled in a non-qualifying component and non-ABAWDs in any component, and ABAWDs not subject to the time limit in any activity.

Line 5: Distinct count of persons in each month of the quarter with ABAWD status of B for banked month.

Line 6: Count of distinct persons by component.

Line 7: Distinct count of people in the activities table with a start date before the end of the FFY and end date after the first of the FFY, or no end date.

9. THE METHOD THE STATE AGENCY USES TO REPORT WORK REGISTRANT INFORMATION ON THE QUARTERLY FORM FNS-583;

DHS employs a state-wide data system (MAXIS) to generate work registrant reports at the state level. County and Tribal Nation income maintenance workers input information into MAXIS via an online system. All SNAP E&T providers use a shared data system (Workforce One) to report participation in SNAP E&T.

State data staff at [DCYFHS](#) access work registrant data from both MAXIS and Workforce One through the DHS Data Warehouse using SQL developed and approved by FNS regional and national staff.

10. 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);

Numbers for each month are recorded separately. This ensures that numbers used in Line 1 of FNS-583 form are only used once during the federal fiscal year. Again, by programming MAXIS and Workforce One to calculate monthly reports using only SSNs, Minnesota is assured of an unduplicated count.

11. 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;

DHS is responsible for both SNAP certification and operation of SNAP E&T. DHS supports an interface which allows the eligibility system (MAXIS) to communicate information automatically to the employment services system, Workforce One (WF1). However, WF1 is unable to communicate information back to MAXIS. As a result, E&T providers must communicate directly with county and tribal eligibility staff.

SNAP E&T policy and practice requires that providers communicate with county and tribal eligibility staff as soon as possible, but no more than 10 days, after discovering information that might affect the participant's eligibility for benefits. This information includes communication upon meeting hourly participation requirements, securing employment, issuance of a provider

determination, or another change in status that might affect benefits. DCYFHS provides a standard form for reporting changes, but counties, tribes, and E&T providers are encouraged to develop systems collaboratively to ensure that status changes are reported once known to the agency.

12. 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; THE STATE AGENCY MUST DOCUMENT HOW IT CONSULTED WITH THE STATE WORKFORCE DEVELOPMENT BOARD. IF THE STATE AGENCY CONSULTED WITH PRIVATE EMPLOYERS OR EMPLOYER ORGANIZATIONS IN LIEU OF THE STATE WORKFORCE DEVELOPMENT BOARD, IT MUST DOCUMENT THIS CONSULTATION AND EXPLAIN THE DETERMINATION THAT DOING SO WAS MORE EFFECTIVE OR EFFICIENT. THE STATE AGENCY MUST INCLUDE IN ITS E&T STATE PLAN A DESCRIPTION OF ANY OUTCOMES FROM THE CONSULTATION WITH THE STATE WORKFORCE DEVELOPMENT BOARD OR PRIVATE EMPLOYERS OR EMPLOYER ORGANIZATIONS. THE STATE AGENCY MUST ALSO ADDRESS IN THE E&T STATE PLAN THE EXTENT TO WHICH E&T ACTIVITIES WILL BE CARRIED OUT IN COORDINATION WITH THE ACTIVITIES UNDER TITLE I OF WIOA;

Minnesota's SNAP E&T program is overseen by the Department of [Human Services/Children, Youth and Families](#) in collaboration with DEED. The units operating E&T components include:

1. Organizations and tribes contracted with DHS;
2. Organizations contracted with DEED for limited funding reimbursement;
3. Organizations contracted with counties;
4. County and Tribal Nation operated workforce services.

Each organization plays a unique role in supporting the SNAP E&T program. DCYFHS provides policy guidance, receives and distributes funds, provides connection to the SNAP eligibility system, ensures alignment with SNAP policy, and leads the statewide expansion of the program. DEED provides opportunities for on-ramps to contracting and provides connection and alignment to the statewide workforce system. Counties and Tribal Nations process direct referrals, receive and act on case-specific information received from E&T providers, provide referral and connection to SNAP E&T providers, and may directly sub-contract with additional organizations for expanded E&T services. SNAP E&T providers offer case management, training, education, and other assistance to individuals through referral or reverse referral, inform counties and tribes of case changes that may affect eligibility including provider determinations, and refer SNAP E&T participants to other social services and employment supports through co-enrollment. Minnesota considers SNAP E&T providers part of the "welfare system" and providers are expected to share information with SNAP eligibility units in accordance with SNAP policy.

13. 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;

Minnesota DCYFHS consults annually with Minnesota Tribal Nations and regularly conducts provider outreach with Tribal Nations, tribal member-serving organizations, and tribal colleges. ~~Since FFY23, DHS has been contracted with the Mille Lacs Band of Ojibwe to provide SNAP E&T services.~~ Minnesota allocates 100% funds to tribes who administer SNAP on the same formula

basis as those funds allocated to counties. Tribal consultation has identified two primary barriers to offering SNAP E&T directly through tribes:

1. Lack of non-federal funding for workforce services on tribal reservations and
2. Complexity of program administration.

Minnesota is committed to continuing to reduce these barriers in collaboration with Tribal Nation partners.

14. 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

N/A

15. 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.

Minnesota SNAP E&T policy allows childcare reimbursement in cases where the individual cannot qualify for existing childcare support programs, is in need of childcare before their childcare support application can be processed, or to cover a gap in existing childcare support funds.

16. 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.

All participants complete an employment plan. In working with participants, providers issue participant reimbursements on a case-by-case basis using SNAP E&T policy guidelines. These guidelines include a list of allowable reimbursements and providers are expected to demonstrate that costs are reasonable and necessary for participation in a SNAP E&T activity.

17. 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.

At the provider's option, Minnesota makes available all participant reimbursements currently allowable by FNS. Additional reimbursements are reviewed by the state, in consultation with FNS, on a case-by-case basis.

18. FOR EACH COMPONENT THAT IS EXPECTED TO INCLUDE 100 OR MORE PARTICIPANTS, REPORTING MEASURES THAT THE STATE WILL COLLECT AND INCLUDE IN THE ANNUAL REPORT IN PARAGRAPH (C)(17) OF THIS SECTION. SUCH MEASURES MAY INCLUDE:

A. THE PERCENTAGE AND NUMBER OF PROGRAM PARTICIPANTS WHO RECEIVED E&T SERVICES AND ARE IN UNSUBSIDIZED EMPLOYMENT SUBSEQUENT TO THE RECEIPT OF THOSE SERVICES;

This is not a measure currently tracked by MN. See section a. 18. E.

B. THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO OBTAIN A RECOGNIZED CREDENTIAL, A REGISTERED APPRENTICESHIP, OR A REGULAR SECONDARY SCHOOL DIPLOMA (OR ITS RECOGNIZED EQUIVALENT), WHILE PARTICIPATING IN, OR WITHIN 1 YEAR AFTER RECEIVING E&T SERVICES;

Number and percentage of participants who engaged in EPC who are employed in the 2nd quarter from exit.

Numerator: Number of participants in EPC in Q3 and Q4 of FFY 2023 and Q1 and Q2 of FFY 2024 who are employed in the 2nd quarter from exit. Denominator: Number of participants in EPC in Q3 and Q4 of FFY 2023 and Q1 and Q2 of FFY 2024.

C. THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO ARE IN AN EDUCATION OR TRAINING PROGRAM THAT IS INTENDED TO LEAD TO A RECOGNIZED CREDENTIAL, A REGISTERED APPRENTICESHIP AN ON-THE-JOB TRAINING PROGRAM, A REGULAR SECONDARY SCHOOL DIPLOMA (OR ITS RECOGNIZED EQUIVALENT), OR UNSUBSIDIZED EMPLOYMENT;

Number and percentage of participants who engaged in EPC who are employed in the 2nd quarter from exit.

Numerator: Number of participants in EPC in Q3 and Q4 of FFY 2023 and Q1 and Q2 of FFY 2024 who are employed in the 2nd quarter from exit. Denominator: Number of participants in EPC in Q3 and Q4 of FFY 2023 and Q1 and Q2 of FFY 2024.

D. MEASURES DEVELOPED TO ASSESS THE SKILLS ACQUISITION OF E&T PROGRAM PARTICIPANTS THAT REFLECT THE GOALS OF THE SPECIFIC COMPONENTS INCLUDING THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO ARE MEETING PROGRAM REQUIREMENTS OR ARE GAINING SKILLS LIKELY TO LEAD TO EMPLOYMENT; AND

Number and percentage of participants who engaged in EPWRT who are employed in the 2nd quarter from exit.

Numerator: Number of participants in EPWRT in Q3 and Q4 of FFY 2023 and Q1 and Q2 of FFY 2024 who are employed in the 2nd quarter from exit. Minnesota FFY 2024 August 14, 2023 44 Component Outcome Measure . Denominator: Number of participants in EPWRT in Q3 and Q4 of FFY 2023 and Q1 and Q2 of FFY 2024.

E. OTHER INDICATORS APPROVED BY FNS IN THE E&T STATE PLAN.

In addition to the federal reporting measures for SNAP E&T, in FFY 24 Minnesota plans to report:

Number and percentage of participants who engaged in Supervised Job Search who are employed in the 2nd quarter from exit.

Numerator: Number of participants who engaged in Supervised Job Search who are employed in the 2nd quarter from exit.

Denominator: Number of participants who engaged in Supervised Job search in the federal fiscal year and have exited.

Job Search Training (JST)

Number and percentage of participants who engaged in Job Search Training who are employed in the 2nd quarter from exit.

Numerator: Number of participants who engaged in Supervised Job Search Training who are

employed in the 2nd quarter from exit

Denominator: Number of participants who engaged in Job Search Training in the federal fiscal year and have exited.

Number and percentage of participants who engaged in Educational Programs who are employed in the 2nd quarter from exit.

Numerator: Number of participants who engaged in Educational Program activities who are employed in the 2nd quarter from exit. Educational Programs include EPB - Basic Education and/or Foundational Skills Instruction, EPC - Career and/or Technical Education Programs or Other Vocational Training, EPEL - English Language Acquisition, EPIE - Integrated Education and Training (IET)/Bridge Programs, EPWRT - Work Readiness Training

Denominator: Number of participants who engaged in Educational Program activities in the reporting period and have exited.

B. ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD) [28]

1. 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;

Minnesota pledges to offer qualifying activities to all ABAWDs subject to the criteria under 7 CFR 273.7(d)(3)(i). N/A

2. ESTIMATED COSTS OF FULFILLING ITS PLEDGE;

N/A

\$3,442,800

3. A DESCRIPTION OF MANAGEMENT CONTROLS IN PLACE TO MEET PLEDGE REQUIREMENTS;

N/A

4. A DISCUSSION OF ITS CAPACITY AND ABILITY TO SERVE AT-RISK ABAWDs;

N/A

5. INFORMATION ABOUT THE SIZE AND SPECIAL NEEDS OF ITS ABAWD POPULATION; AND

N/A. Anticipated number of ABAWDs in the State who meet the criteria under 7 CFR 273.7(d)(3)(i) is 34,000.

6. INFORMATION ABOUT THE EDUCATION, TRAINING, AND WORKFARE COMPONENTS IT WILL OFFER TO MEET THE ABAWD WORK REQUIREMENT

N/A. Apprenticeship

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Basic / Foundational Skills Instruction

Career / Technical Education Programs or other Vocational Training

English Language Acquisition

Integrated Education and Training / Bridge Programs

Internship

Job Retention

Job Search Training

On-the-job Training

Self-Employment Training

Supervised Job Search

Transitional Jobs

Work Activity

Work Readiness Training

Workfare

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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.

Has the state incorporated TAA into the sections indicated above?

Yes

JOBS FOR VETERANS' STATE GRANTS

(OMB Control Number: 1293-0017)

COMPONENTS OF THE JOBS FOR VETERANS STATE GRANTS STATE PLAN

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).

The Minnesota Department of Employment and Economic Development (DEED) is the designated State Workforce Agency (SWA). DEED is in the process of preparing the 2024 –2027 Plan, in accordance with the established timelines for submission. Services to veterans are a high priority in all Minnesota American Job Centers (AJC).

Minnesota AJC offices are branded as CareerForce locations where a full array of employment services is provided to veterans and eligible persons. The CareerForce locations also provide many tools and resources to job seekers and employers, such as Labor Market Information (LMI), career guidance, talent pool, and other great tools.

Minnesota JVSG funds the following staff positions: the Disabled Veterans Outreach Program Specialist (DVOP), the Local Veterans Employment Representative (LVER), and the Consolidated DVOP/LVER position (~~CP~~CODL). These positions are fully integrated into the CareerForce system.

The State continuously evaluates the geographical assignment of DVOP, LVER, and ~~CP~~CODL staff to increase the availability, quantity, and quality of services to be provided. The state continues to monitor and modify staff placement as needed and, upon approval of DOL VETS, within Minnesota CareerForce locations to ensure that DVOP and ~~CP~~CODL staff are in the best locations to serve veterans and eligible persons. Currently, DVOP, ~~CP~~CODL, and LVER staff are mainly located in comprehensive CareerForce locations as defined by the Local Workforce Investment Board (LWIB). These areas have the largest population of veterans, as indicated by the Minnesota Department of Veterans Affairs (MDVA) county population reports. Also, JVSG staff covers multiple counties in their geographic area of responsibility and affiliate and stand-alone locations as needed and by appointment.

The DVOP's role is focused on providing individualized career services (ICS) to veterans with ~~significant barriers to employment (SBE)~~ and eligible persons through the state's case management system, WorkforceOne (WF1). The case management framework is based on three elements that are followed during this process: comprehensive assessment, documented plan of action, and consistent contact. The LVER role focuses on educating employers on the value of recruiting, hiring, and retaining veterans in the workplace. The ~~CP~~CODL staff performs both DVOP and LVER roles.

Minnesota has developed a standardized process (please see Veterans and Eligible Persons Intake Process **Attachment A**) for referring eligible veterans and eligible persons to DVOP specialists and ~~CP~~CODLs. **In accordance with VPL 03-14 changes I and II, VPL 07-19, and VPL 03-19.

The ~~triage screening~~ process begins when a customer arrives at the CareerForce location entry point. Signage and posters are displayed to highlight Priority of Service (POS) and help identify veterans and eligible persons in all CareerForce locations. Customers are greeted and asked if they served in the U.S. Military. If the answer is "yes", the Veteran is directed to complete the "Veterans Employment Eligibility Screening Form~~Veterans Questionnaire~~" and return it to the CareerForce entry point.

The JVSG staff is trained and instructed not to perform intake duties or point-of-entry functions normally assigned to other CareerForce partner staff. Non-JVSG staff conducts the ~~triage screening~~ by reviewing the Veterans Employment Eligibility Screening Form~~questionnaire~~ responses. A veteran who ~~indicates an SBE~~ is determined eligible is referred to a DVOP or ~~CP~~CODL. If DVOP or ~~CP~~CODL is not available, the ~~SBE~~ veteran is referred to a "designated" individualized career services (ICS) provider. ~~Other Non-SBE veterans not eligible for DVOP services~~ are provided information on POS and screened for additional program eligibility by non-JVSG staff. The virtual process is done online through an automated ~~triage screening process~~. Customers who visit our public-facing website <https://careerforce.mn.gov/veterans> ~~www.CareerForceMN.com/Veterans~~ are made aware of resources and services in addition to POS and a link to the online Veterans Employment Eligibility Screening Form~~veterans questionnaire~~. Veterans who ~~indicated an~~ with barriers to employment ~~SBE~~ are referred to a DVOP or ~~CP~~CODL for ICS. ~~Non-SBE~~

Veterans who did not indicate barriers to employment are provided information on POS for additional program eligibility and referred to non-JVSG staff for services.

Once a veteran is referred to a DVOP or CPCODL, staff enrolls the veteran into WF1. After enrollment, staff completes a comprehensive assessment to document barriers, assess job readiness, and offer career guidance. The comprehensive assessment is a critical stage in the case management process, which pre-populates the employment plan. The DVOP or CPCODL staff and the veteran develop trust and rapport, which is important in establishing commitment, setting achievable goals, and developing a solid Individual Employment Plan (IEP). To overcome barriers and achieve great results, the veteran receives individualized job search activities such as resume writing and development, occupational skills training, mock interviews, salary survey reviews, and labor market information. Also, veterans are referred to supportive services as needed ~~including,~~ including the County Veterans Service Officer (CVSO), Homeless Veterans Reintegration Program (HVRP), Veterans Administration (VA), and other service organizations.

Once a veteran successfully achieves the employment goal, staff provides post-exit follow-ups as an employment retention strategy.

JVSG staff, SWA, and partner staff attend cross-training to learn about best practices in serving veterans and eligible persons with available resources and services.

DVOPs LVERs, CPCODLs, and partner staff attend online eLearning courses and instructor-led training courses provided by the National Veterans Training Institute (NVTI). In addition, staff attends regular meetings and webinars produced by the CareerForce Division.

The SWA and JVSG programs work closely with other agencies such as the Minnesota Department of Military Affairs, State and Federal Departments of Veterans Affairs, Department of Labor and Industry, Minnesota State Colleges and Universities, Minnesota Department of Human Services, Minnesota Department of Corrections and other agencies to ensure that all staff serving veterans are aware of the myriad of resources available to veterans. Additionally, the aforementioned agencies are invited to learn more about the CareerForce system and available resources and services either through virtual or in-person visits.

LVER and CPCODL staff conduct regular POS refresher training throughout the state. Also, DVOP staff provides guidance on veterans services and available resources in the community.

JVSG staff invites SWA staff to learn about veterans services in addition to the roles and responsibilities of DVOP, LVER, and CPCODL staff. SWA staff such as the Dislocated Worker Program, Supplemental Nutrition Assistance Program (SNAP), Work Opportunity Tax Credit (WOTC), and other CareerForce program staff invite JVSG staff to learn about the services and resources available to veterans and eligible persons.

LVERs and CPCODLs connect with local employers to promote job opportunities for veterans through the following activities:

- Attend CareerForce employer navigator meetings to streamline CareerForce efforts in serving the businesses and referring veterans for employment opportunities.
- Attend meetings of the local Chamber of Commerce, area unions, and hiring events to promote all CareerForce services, both as a networking tool and for the opportunity to speak about veterans programs.
- Visit employer locations in person and attend facility tours to learn about employer

corporate culture and work environments to promote their positions to job-seeking veterans.

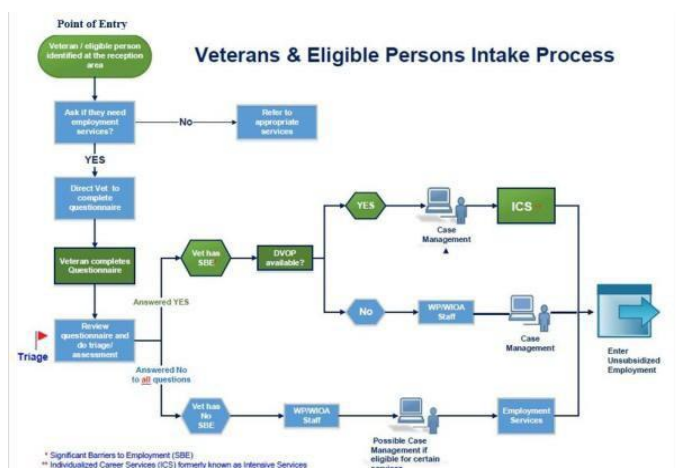
- Plan employer and recruiter roundtable meetings to share best practices on recruiting, hiring, and retaining veterans.
- Plan and participate in job fairs in partnership with local employers.
- Plan and participate in Veterans Talent Series Webinars to educate employers on the recruitment and retention of veterans in the workplace.
- Collaborate with the business strategy consultants and SWA local employer engagement team.

Minnesota implemented Salesforce as a business customer relationship management (CRM) tool in 2015. LVERs and ~~CP~~CDLs have licenses to use the CRM to document and manage business outreach efforts and track

services and job referrals to employers. In addition, JVSG leadership monitors LVERs and ~~CP~~CDLs outreach efforts and runs reports by business industry and region.

ATTACHMENT A

Veterans & Eligible Persons Intake Process



B. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.

~~In accordance with Veterans Employment and Training Service guidance, VPL 03-14 changes I and II, VPL 07-14, and VPL 03-19, Minnesota is prioritizing the provision of employment services to veterans and eligible persons in need of ICS.~~

The State is committed to supporting our veterans, with a particular focus on those who are experiencing employment barriers. To be eligible for individualized career services (ICS) through the Disabled Veteran Outreach Program (DVOP), a veteran must meet the eligibility criteria defined in 38 U.S.C. § 4211(4) and must have an employment barrier as

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specified in VPL 05-24. Additionally, individuals may also qualify if they belong to a separate population identified through current appropriations.

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To identify veterans and eligible persons most in need of ICS, CareerForce entry point staff conducts ~~triage screening~~ and initial assessments of veterans who completed the Veterans Employment Eligibility Screening Form ~~veterans questionnaire~~ which is a tool used to determine if they are eligible for DVOP and ~~EPCODL~~ services.

CareerForce staff refers eligible veterans or eligible ~~spouses~~ persons to DVOP and ~~EPCODL~~ if they are determined to have an ~~SBE~~ employment barrier ~~when they attest to belonging to at least one of the criteria below:~~

- ~~A special disabled or disabled veteran, as those terms are defined in 38 U.S.C. 4211(1) and (3); Special disabled and disabled veterans are those:~~
 - ~~Who are entitled to compensation (or those who would be entitled to compensation, yet are not receiving it due to the receipt of military retired pay) under laws administered by the Secretary of Veterans Affairs; or~~

DVOP specialists will limit their activities to providing services to eligible populations who are interested in receiving one or more individualized career services, and are defined as an eligible veteran or eligible person, and are experiencing at least one of the qualifying employment barriers defined below:

1. A disability, which may include any of the following:
 - a. Special disabled veteran, defined in 38 U.S.C. § 4211(1) as 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 of Veterans Affairs for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined to have a serious employment handicap; or person who was discharged or released from active duty because of a service-connected disability.
 - b. Disabled veteran, defined in 38 U.S.C. § 4211(3) as 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 of Veterans Affairs; or a person who was discharged or released from active duty because of a service-connected disability.
 - c. Other disability. Eligible veterans and eligible persons who self-identify as having a disability, as defined by the Americans with Disabilities Act, 42 U.S.C. § 12102.
2. Is a Vietnam-era veteran, as defined by 38 U.S.C. § 4211(2) as an eligible veteran any part of whose active military, naval, or air service was during the Vietnam era, as defined by 38 U.S.C. § 101(29).
3. Is a recently separated veteran, defined in 38 U.S.C. § 4211(6) as a veteran who was discharged or released from active duty within the last three years.
4. Has been referred for employment services by a representative of the Department of Veterans Affairs. Is experiencing homelessness, as defined in Sections 103(a) and (b) of

the McKinney Vento Homeless Assistance Act (42 U.S.C. § 11302(a) and (b)). Is justice-involved, as defined in WIOA Section 3(38), 29 U.S.C. § 3102(38) (definition of "offender").

5. Is between the ages of 18 – 24 years of age at the time of enrollment.
6. Is educationally disadvantaged, meaning that the individual lacks a high school diploma or equivalent certificate.
7. Is economically disadvantaged, which means any of the following:
 - a. Meets the definition of a low-income individual in WIOA Section 3(36), 29 U.S.C. § 3102(36).
 - b. Unemployed.
 - c. Heads of single-parent households containing at least one dependent child.

In addition to these eligible veterans and eligible persons who are experiencing employment barriers, DVOP specialists may also serve members of additional populations defined as:

1. Transitioning Service Members (TSM) who, at the time of enrollment, have participated in any part of the Transition Assistance Program, including self-paced online modules and Individualized Initial Counseling.
2. Wounded, ill, or injured members of the Armed Forces who are receiving treatment in military treatment facilities or warrior transition units.
3. Spouses or other family caregivers of those wounded, ill, or injured service members.

- ~~Who were discharged or released from active duty because of a service-connected disability;~~
- ~~A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a) and (b)), as amended. A recently separated service member, as defined in 38 U.S.C. 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;~~
- ~~An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;~~
- ~~A veteran lacking a high school diploma or equivalent certificate;~~
- ~~A low-income individual (as defined by WIOA Section 3 (36));~~
- ~~A veteran between the ages of 18 and 24 years old who possesses limited civilian work history;~~
- ~~A Vietnam-era veteran. Vietnam-era veterans are those:~~
 - ~~For which any part of their active military, naval, or air service was during the Vietnam era (the period beginning February 28, 1961, and ending May 7, 1975, in the case of a veteran who served in the Republic of Vietnam during that period, and the period beginning August 5, 1964, and ending May 7, 1975, in all other cases)~~
- ~~Eligible Transitioning Service Members, Spouses and Caregivers~~
 - ~~Transitioning members of the Armed Forces who have been identified as in need of individualized career services;~~
 - ~~Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in Military Treatment Facilities (MTFs) or Warrior Transition Units (WTUs); and~~
 - ~~The spouses or other family caregivers of such wounded, ill, or injured members.~~

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JVSG OUTREACH INITIATIVES AND SERVICES TO SPECIAL POPULATIONS

The Veterans Employment Eligibility Screening Form Veterans questionnaire is provided to all special populations to identify if they have an a barrier to employment SBE. Only those eligible Veterans who are found to have an SBE are enrolled in DVOP and CP/CODL services.

Chapter 31 Disabled Veterans ~~The Veterans Intensive Service Coordinator (ISC) is collocating with The Veterans Affairs (VA) Veteran Readiness and Employment (VR&E) Regional office in Fort Snelling. The ISC is responsible for the coordination of initial communication between the Veteran, the VR&E counselor, and the DVOP. DVOPs typically receive notification of an upcoming Chapter 31 disabled Veteran client within 90 days of graduation or upon designation as "job ready" by the VR&E office. When the DVOPs receive the referral from the ISC, they complete a comprehensive assessment and an Individual Employment Plan in collaboration with the referred veterans.~~

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Chapter 31 Disabled Veterans

The state will establish a local Memorandum of Understanding with the U.S. Department of Labor - Veterans' Employment and Training Service (DOL/VETS) and the Veterans Affairs (VA) Veteran Readiness and Employment (VR&E) program. This agreement will clearly define the roles and responsibilities of staff across the partner agencies.

The state is committed to delivering vital workforce information to veterans entering the VR&E program and providing priority job search assistance to those completing it. Furthermore, all partner agencies will engage in a quarterly review of VR&E customers to ensure they are making significant progress toward their career goals.

During the pandemic, the state established an electronic mailbox in order for VR&E staff to send encrypted messages and referrals to maintain confidentiality and protect sensitive data.

JVSG staff Supervisor and VR&E Manager maintained constant communication to address any issues or questions about the Ch-31 veterans case management process.

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Homeless Veterans - DEED and Minnesota Department Veterans Affairs established the Homeless Veteran Registry Cooperation Agreement in 2016 which allows JVSG staff to access a SharePoint database of registered homeless veterans. Through active participation in the Homeless Veteran Registry, and ongoing partnership in Continuum of Care planning efforts, JVSG is visible and available for Veterans experiencing homelessness throughout Minnesota. JVSG partners with MACV staff which serve on Continuum of Care committees and play crucial roles in informing policy and direction, particularly related to Veteran homelessness. Also, per VPL 05-24 JVSG and HVRP partner closely to facilitate dual-enrolling clients to leverage CareerForce resources, MACV's expertise, and services for Veterans experiencing homelessness.

~~Also, per VPL 3-16, JVSG and MACV partner closely to implement dual-enrolling clients to leverage CareerForce resources, MACV's expertise, and services for Veterans experiencing homelessness.~~

~~**Native American Veterans** - Veterans Employment Services serves the Native American Veteran population through the DVOP position in the Bemidji area which includes the Red Lake, Leech Lake, and White Earth Tribal Nations in the northern part of the state. The Bemidji DVOP is collocating with the Tribal Veterans Service Officers (TVSO) at White Earth every Tuesday.~~

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~~**Women Veterans**– Women Veterans represent approximately 17 percent of returning National Guard and Reserve troops in Minnesota. Minnesota Department of Veterans Affairs estimates there are almost 23,000 female Veterans in Minnesota. Of that number, about 8700 have served in the Persian Gulf, or OIF/OEF. Minnesota has Veteran staff that is active in different Women's Veterans groups and serves as a liaison with the local DAV chapter. Minnesota currently employs 7 Women Veterans Representatives.~~

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Justice-Involved Veterans- DEED and the Minnesota Department of Corrections have extended the interagency agreement until June 2026 to allow DVOPs and ~~CPCODLs~~ access to correctional facilities statewide to continue providing ICS and counseling for justice-involved veterans nearing their release date. JVSG staff is assigned as the Justice-Involved Veterans Project Lead and currently attends the steering committee meetings of the Veterans Diversionary Court Program. The court exists to provide an option for veterans who have had encounters with the criminal court system and provide an alternative to prison. Veterans Treatment Courts are modeled after drug courts, which promote collaboration among the judiciary, community corrections agencies, drug treatment providers, and other community support groups.

Demobilizing and Transitioning Service Members - Minnesota's "Beyond the Yellow Ribbon" Reintegration Campaign is the backbone of post-deployment reintegration services. MN JVSG staff has been a critical part of this process, which includes five different events for Service members and their families.

The process begins 3–4 months before deployment. "Family Readiness Academies" are designed to allow families to ask questions and provide information to Troops and their families on what to expect during the deployment. DVOP staff provide resource information and referrals for common issues faced by families. Approximately 30 to 60 days before Troops return home, a "Yellow Ribbon Community Event" is sponsored to help families understand and support their returning Soldiers.

Business owners, educators, civic leaders, and law enforcement are called together for a briefing on what they can expect upon their Soldiers' return. JVSG staff provide information on AJC services and community resources. Twenty-six Minnesota service providers send staff and materials to various locations as Troops return from overseas deployment for an Initial Reintegration Event.

The Beyond the Yellow Ribbon Program - On May 4th, 2022, Governor Tim Walz of Minnesota proclaimed the Minnesota Department of Employment and Economic Development a Beyond the Yellow Ribbon (BTYR) Organization. BTYR Company Program pays tribute to those organizations with an exceptional record of support, commitment, and compassion for servicemembers, veterans, and their families through various programs, policies, and public works.

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~~Business owners, educators, civic leaders, and law enforcement are called together for a briefing on what they can expect upon their Soldiers' return. LVER and DVOP staff provide resource information, and answers to some difficult questions relating to their combat experience, and how that may affect their lives. Twenty six Minnesota service providers send staff and materials to various locations as Troops return from overseas deployment for an Initial Reintegration Event. DVOP staff conduct group presentations and work one-on-one to provide information on workforce services available. Following the initial reintegration events, follow-up events known as Phases I, II, and III are offered.~~

The Beyond the Yellow Ribbon Program—On May 4th, 2022, Governor Tim Walz of Minnesota, proclaimed the Minnesota Department of Employment and Economic Development a Beyond the Yellow Ribbon (BTYR) Organization. BTYR Company Program pays tribute to those organizations with an exceptional record of support, commitment, and compassion for servicemembers, veterans, and their families through various programs, policies, and public works.

Employer Support for Guard and Reserve (ESGR)—MN Employer Support for Guard and Reserve (ESGR) signed a statement of support in May 2022, to recognize DEED's efforts in supporting the guard and reserve members. Also, the Chief Army Reserve Office in Fort Belvoir, VA, signed a proclamation in June 2022, to declare DEED as a proud supporter of the US Army Reserve which facilitates access to the reserve facilities and allows greater connection with the military leadership to assist Soldiers and Families in overcoming barriers and obtaining meaningful employment or education opportunities. The partnership between JVSG and the Guard and Reserve is well demonstrated in the ongoing planning of joint job fairs, and other community events.

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

The Disabled Veterans Outreach Program (DVOP) specialists work directly with veterans and eligible persons who have significant barriers to employment, as identified in ~~VPL 05-24.38 U.S.C. 4103A (a)(1)~~. The services provided by a DVOP specialist are referred to as individualized career services which include, but are not limited to:

- Comprehensive assessment interviews.
- Career guidance services.
- Individual Employment Plans (IEPs).
- Staff-assisted job search activities.
- Labor Market Information (LMI).
- Basic staff-assisted career services.

DVOP specialists also perform the following duties including case management, outreach services to veterans, and group job counseling, which differs from licensed counseling. To provide the veterans with the best services possible and to help them reach their employment goals, a DVOP establishes effective trust, rapport, and relationship building with the veterans they serve.

DVOP Core Responsibility 1 — ~~Identify and~~ facilitate individualized career services needed by Veterans with significant barriers to employment (SBE) so that they can be placed in suitable employment or a training program commensurate with their IEP. Tasks for this responsibility will include:

1. In cooperation with the U.S. Department of Veterans Affairs (VA) Veteran Readiness and Employment (VR&E) staff, ~~refer identify~~ Chapter 31 Veterans (CH31) who have completed or are participating in VR&E programs and need job search assistance to the screening process and then referred to DVOP services.
- ~~2. Utilize the standardized "Veterans Questionnaire Screening Tool" to identify and prioritize services to disabled and other veterans with an SBE.~~
3. Conduct assessments to determine employment barriers and services needed.
4. Develop a documented case management file in WorkforceOne (WF1) for each veteran receiving individualized career services.
5. Develop an IEP for each case-managed veteran.
6. Refer veterans to appropriate supportive service providers.
7. Coordinate linkages with other employment and training providers and the VA to support Veterans in their job search activities.
8. Provide vocational guidance to eligible Veterans.
9. Refer Veterans to appropriate public and private sector jobs.

Core Responsibility 2 — While case managing SBE veterans is a high priority, DVOPs are afforded opportunities to conduct outreach activities to ~~identify and contact SBE eligible~~ Veterans who would benefit from or need ICS. Tasks for this responsibility include:

1. Develop outreach programs in cooperation with the VA and DOL-VETS.
2. Participate in ~~all~~ Military reintegration events, the Annual Veterans Career Fair, and ~~all~~ other outreach events as assigned.
3. Conduct outreach activities with VR&E to market all services to Chapter 31 Veterans.
4. Conduct outreach activities to other organizations such as state Vocational Rehabilitation Providers, Homeless Veterans Reintegration Projects (HVRP), VA Hospitals and Veteran Centers,

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County Veteran

Service Offices, correctional facilities, Veterans Treatment Courts, homeless shelters, Tribal and Native American communities, civic and community service organizations, CareerForce partners, and other service providers as identified.

Core Responsibility 3 — Provide vocational guidance to eligible ~~SBE~~ Veterans who need assistance with vocational change or adjustment. Tasks for this responsibility will include:

1. Establish an IEP for all ~~SBE~~ Veterans requesting vocational guidance.
2. Provide vocational guidance using knowledge of labor market information and assessment tools.
3. Refer candidates to a qualified vocational counselor as necessary.
4. Assist Veterans in using electronic assessment and job search tools.

The DVOP works closely with other service providers in the community to provide career services to veterans with ~~SBEs~~. These providers include but are not limited to the VA, CareerForce partners, Community-based services, Federal, State, county, and local programs, educational institutions, VA hospitals, and Vet Centers, homeless programs and shelters, vocational rehabilitation programs, and other service providers.

MANAGING THE DVOP CASELOAD

~~Due to the historically low unemployment rate for veterans in our state, a DVOP specialist may not always have a full caseload, in this case, they perform~~ perform additional activities such as:

- Review all open case files of current veterans enrolled in the case management system ~~participants with an SBE or in a priority category~~ and perform case management duties.
- Conduct relationship-building, outreach, and recruitment activities with other service providers in the local area to enroll eligible SBE and priority category ~~veterans~~.
- Attend correctional facilities, armories, and tribal lands to recruit ~~SBE~~ veterans.

Local Veterans Employment Representatives (LVER) perform a wide range of duties on behalf of our veterans specifically related to outreach to the employer community and facilitation within the state's employment service delivery system. These duties are outlined in 38 U.S.C. 4104(b) and VPL 03-22. LVERs are assigned responsibilities that promote the advantages of hiring veterans to employers, employer associations, and business groups. LVERs advocate for all veterans served by the CareerForce system with business, industry, and other community-based organizations by participating in the following activities :

- Plan and participate in career fairs in conjunction with employers.
- Conduct outreach to employers to educate them on the value veterans bring to the business by organizing job search workshops, seminars, and recruiter roundtables.
- Coordinate with unions, apprenticeship programs, and business organizations to promote and secure employment and training opportunities for veterans.
- Inform federal contractors of the process of recruiting qualified veterans.
- Facilitate employment, training, and placement services to veterans through the CareerForce system.
- Provide services to local businesses that will enhance, support, and promote veterans' employment, particularly veterans receiving ICS from a local DVOP and ~~CPCODL~~.
- Plan, develop, and coordinate the marketing, and delivery of CareerForce employment services to businesses, veterans, and other eligible persons.
- Provide technical support to the CareerForce partner staff in the provision of veteran employment services in accordance with DOL VETS guidelines.

- Entice employers seeking to hire veterans by promoting incentives such as the Work Opportunity Tax Credit (WOTC), on-the-job training (OJT), credentialing, and licensing opportunities.
- Partner with veteran community service organizations, educational facilities, local elected officials, and other State Departments, as well as other CareerForce staff and management.

Core Responsibility 1 — Develop employer outreach activities to establish, maintain, and facilitate regular contact with employers to promote employment and training opportunities for the benefit of Veterans. Tasks for this responsibility include:

1. Develop job opportunities for Veteran job seekers through outreach efforts with Minnesota employers: job development phone contacts, in-person employer visits, and participation in job fair activities on behalf of Veterans.
2. Communicate and coordinate with Business Engagement Specialists in the local CareerForce to facilitate and promote job opportunities for veterans, especially those with ~~SBEs~~ barriers to employment.
3. Promote the "Veteran Friendly Employer" initiative to employers.
4. Encourage employers to hire veterans utilizing apprenticeships and OJT programs, State and Federal dislocated worker programs, and GI Bill benefits.
5. Monitor Federal Contractor Job Listings (FCJL) and Vet Central job opportunities for veterans on DVOP caseload, as well as other CareerForce veterans.
6. Provide contacts and job leads to DVOPs.
7. Provide Labor Market Information (LMI) to employers.

Core Responsibility 2 — Advocate for veterans seeking employment and training opportunities with business, industry, and community—based organizations. Tasks for this responsibility include:

1. Reach out to community leaders, employers, labor unions, training programs, and veteran service organizations.
2. Promote veterans POS in employment and training programs.
3. Maintain current information on employment and training opportunities.
4. Plan and participate in job fairs to promote services to veterans and encourage participating employers to become "Veteran Friendly Employers."
5. Promote licensing and certification assistance and training opportunities for Veterans using training providers and credentialing bodies.
6. Work with unions, apprenticeship programs such as Helmets to Hard Hats, the Department of Labor and Industry, and employers to promote OJT, apprenticeship, and other available training opportunities.
7. Establish and maintain contact with the National Guard, Reserve Family Readiness Groups, and Family Assistance Centers in the assigned area. Provide education and information regarding veteran employment services, CareerForce locations, and Beyond the Yellow Ribbon events.

Core Responsibility 3 — Provide technical assistance and guidance to DVOPs and CareerForce partner staff. Tasks include:

1. Evaluate veteran service activities of CareerForce staff to attain program goals and ensure consistency in the provision of ~~veterans~~ veteran services.
2. Train CareerForce staff and partners to enhance their knowledge of veterans employment and training services.

3. Provide technical guidance to CareerForce staff to ensure that program services are administered with accuracy and uniformity.
4. Develop and implement a local veterans employment service delivery plan, in conjunction with local management, Veterans Staff Supervisor, and Veterans State Director. Ensure community resources are utilized and eligible customers are served in accordance with federally mandated standards and delivery area objectives.
5. Participate in the interviewing process with Veterans program management and local management in the selection of new DVOP/LVER staff to ensure qualified personnel is hired and the integrity of the various veteran services programs is maintained.

Core Responsibility 4 — Provide capacity building for CareerForce system service providers to ensure that veterans and other eligible persons are provided a full range of services to meet their employment and training needs. Tasks include:

1. Train CareerForce partner staff to enhance their knowledge and services to veterans.
2. Organize and promote employment opportunities, including career and resources fairs.

Core Responsibility 5 — Manage and maintain adherence to POS, and DOL VETS priorities for services to Veterans with an ~~SBE~~, including labor exchange services. Tasks include:

1. Facilitate and maintain the provision of labor exchange services by local CareerForce staff to Veterans including the identification of ~~SBE~~ Veterans, proper referral to a DVOP, or in the absence of the DVOP, to the ICS provider, and referral to vocational counseling, testing, job search assistance.
2. Provide job development and employer outreach on behalf of all veterans, with a focus on ~~SBE~~ veterans enrolled in DVOP and ~~CPCODL~~ services.
3. Refer Veterans to the Department of Labor DOL VETS partner as needed to assist with reemployment rights issues covered under the Uniformed Services Employment and Reemployment Rights Act (USERRA) law.
4. Assist employers with special job accommodations for disabled Veterans.

Consolidated Positions (~~CPCODL~~): Minnesota has three approved ~~CPCODL~~s in accordance with Title 38 USC, § 4102a subsection

(h) that allows for a JVSG staff person to perform both DVOP and LVER roles to serve ~~SBE~~ veterans and eligible persons, and rural businesses. ~~CPCODL~~-provides more efficient administration of DVOP duties and LVER duties in rural and remote areas.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

The State of Minnesota is committed to ensuring program integration and coordination of employment and training services through the CareerForce system. To improve and enhance the delivery of employment and training services for veterans, CareerForce offices are integrated with other WIOA program partners to create a unified CareerForce system. The CareerForce system is the primary source of information and services for Minnesota's job-seeking veterans.

DVOPs LVERs, and ~~CPCODL~~s have formed strong partnerships with other CareerForce 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 other 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).

Integrating DVOPs, LVERs, and ~~CPCODL~~ programs as full partners in the CareerForce system is an ongoing process that includes regular staff meetings with system partners to share information on employment and training services available statewide. At staff meetings, program information is highlighted with emphasis on POS to veterans in a one-stop environment. The success of Minnesota's CareerForce system is predicated on partnerships that continuously strive to improve services to all job seekers and employers while ensuring veterans continue to receive excellent POS.

Local Veterans Employment Representatives (LVER) and ~~Business Services team~~ Employer Engagement team and named Strategy Consultants collaborate consistently and effectively to conduct joint outreach events to numerous business organizations and employers throughout Minnesota to promote the hiring of veterans and to locate veterans in need of intensive services.

The following activities demonstrate effective integration and collaboration between service providers, partners, DVOP specialists, LVER, and ~~CPCODLs~~ to promote employment, training, and placement services for veterans:

- CareerForce division staff including JVSG staff attended joint training on customer services, and innovation lab to enhance customer experience in addition to technical and non-technical training topics.
- DVOP specialists, LVER, and ~~CPCODLs~~ attend and participate in local CareerForce staff meetings which include WP staff, adult programs, and other partners.
- All DVOP specialists and ~~CPCODLs~~ work closely with the CareerForce locations and WIOA providers in their assigned geographic regions. When veteran referrals are made, DVOPs and ~~CPCODLs~~ enroll veterans into the state's case management information system, WorkforceOne (WF1) which is used by partners in the CareerForce system, and it is tracked and monitored using the same system.
- LVERs visit CareerForce locations in their region regularly to provide training and guidance on POS.
- LVERs train partner staff and service providers on Veteran resources and when to refer veterans to DVOP staff for individualized career services.
- LVERs contribute to local initiatives such as the "Meet and Greet" and "Employer of the Day" employer events. LVERs participate in recruiting and hiring fairs and other initiatives.
- DVOP specialists, LVER, and ~~CPCODLs~~ are co-located with partner staff in the CareerForce locations throughout Minnesota.
- DVOP specialists, LVERs, and ~~CPCODLs~~ invite other veteran service organizations (VSOs) to attend CareerForce locations to be familiar with services and resources.
- Veterans Employment Resources Group (VERG) is made up of several VSOs who attend CareerForce locations during monthly meetings to learn about the services and resources of CareerForce and the VSOs.
- DVOP/LVER staff are represented on all appropriate CareerForce work teams, workgroups, policy groups, or other appropriate CareerForce teams.

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

The U.S. DOL VETS provides up to 1% of the Jobs for Veterans State Grant each year to be used as incentive awards to individuals, partners, teams, and CareerForce offices for going above and beyond in providing exemplary

employment services to veterans and for effectively connecting veterans to employment and training opportunities.

The JVSG Annual Incentive Awards are distributed IAW VPL 1-24 Attachment 5, JVSG Incentive Award Plan TAG, on a Quarterly and Annual basis.

These incentive funds represent an important opportunity to acknowledge and highlight effective work practices, outstanding individual services to veterans, and team-based recognition for outstanding group services to veterans.

ELIGIBILITY

The following are eligible to receive an award:

- Disabled Veterans' Outreach Program (DVOP) specialists
- Local Veterans Employment Representative (LVER) staff
- Consolidated DVOP/LVER (~~CP~~CODL) staff
- Individuals providing employment, training, and placement services to veterans under the Workforce Innovation and Opportunity Act (WIOA), including labor exchanges funded by the Wagner-Peyser Act; and
- An employment service team or office

Minnesota's incentive award program goals

are:

- To acknowledge superior performance and customer service for Veterans;
- To elevate the visibility and importance of veteran's services to CareerForce partners and staff;
- To generate a stronger sense of unity and collaboration between the Veteran's program and the state CareerForce system.
- Reward and recognize the provision of excellent "Priority of Service" and integration of services to Veterans and other eligible persons at the CareerForce locations.
- To provide encouragement and motivation to offer high-quality services to Veterans.

SELECTION CRITERIA

Selection criteria for award recipients are based on performance or activities during the fiscal year the award is given. Both objective and subjective data are to be considered in selecting nominees. Nominees should be considered to have demonstrated outstanding outreach and/or service provision on behalf of Veterans who have ~~significant~~ barriers to employment, especially disabled Veterans, homeless Veterans, and incarcerated Veterans. Attitude, motivation, program improvement, positive feedback, and other indicators of outstanding performance may be given consideration above numerical data. The Minnesota Dept. of Employment & Economic Development will convene an awards committee and administer the awards.

Examples of selection criteria may be:

- Development of a program, for which the impact may not be directly measurable (e.g., a resume skills-building program, special programming for targeted Veteran groups, workshops that address ~~significant~~ barriers to employment);
- Outstanding cooperative case management (between DVOP & CareerForce partners); Ideas that are implemented to improve the service delivery system leading to Veteran living—wage and sustainable employment, improvement in outcome performance for Veterans, reduced time or cost, or that promote collaboration that improves services to Veterans;
- Outreach/community-relations efforts, to include employers, social service entities, and/or educators, etc.; or

- Exemplary efforts to assist ~~SBE~~ SBE eligible Veteran populations (homeless, undereducated or under-skilled, low-income, disabled veterans, justice-involved veterans, etc.).

NOMINATION PROCESS AND TIMING AWARDS

- Nominations will be solicited through Minnesota local CareerForce development boards (LWDBs) and local CareerForce Offices.
- Nominations will reflect the accomplishments of the entity and include sufficient detail to adequately describe to the awards committee the improvements in services to Veterans made by the entity.
- Nomination descriptions, supplemental performance data, testimonials, and other related information may be included as attachments.
- Nominations must be received 2 weeks in advance of the Awards Committee meeting date each quarter.
- Nominations will be reviewed by a panel consisting of the State Veteran's Program Director, a representative of the U.S. Department of Labor—Veterans' Employment and Training Service (USDOL—VETS), a representative from DEED HR, and a CareerForce Partner.
- No nomination committee member may be directly connected with any person or office being reviewed for these awards.
- Awards will be announced to the recipient(s) quarterly.
- Award funds must be obligated by the end of the federal fiscal year, September 30. An annual Incentive Award report will be included in the quarterly report due in mid-November. The report will detail all incentive awards made.
- DVOPs share information with partner staff regarding available community resources they can access to better serve veterans who may not be eligible for DVOP services.

2. THE APPROXIMATE NUMBER AND VALUE OF CASH AWARDS USING THE ONE PERCENT INCENTIVE AWARD ALLOCATION;

INDIVIDUAL AND OFFICE AWARDS

The incentive Awards funds will be disbursed as Cash awards to eligible and selected awardees IAW Title 38 U.S.C. § 4112. The State Veterans Employment Programs Director and the Veterans Employment Programs Field Operations Manager administer the funds disbursement.

Minnesota recognizes individual nominees or CareerForce offices based on the selection criteria outlined below.

- Individual employee awardees are selected through a quarterly review process by the committee and DEED Human Resources. Individual awards are in the amount of \$1,500 in addition to fringe benefits.
- CareerForce office awards are reviewed and selected by a review committee comprised of the federal USDOL-VETS State Director, the DEED CareerForce Director, The Veterans Employment Programs Director, and the Veterans Employment Field Operations Manager. The office awards are in the amount not to exceed \$4,000 each.

On average, we estimate that \$14,000 would be allocated to seven nominated individuals, which includes fringe benefits. Additionally, for office awards, we estimate that a total of \$12,000 would be allocated to three AJs, with a maximum of \$4,000 for each nominated office.

3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND

We are not planning for non-cash performance incentive awards. The incentive Awards funds will be disbursed as cash awards to eligible and selected awardees IAW Title 38 U.S.C. § 4112.

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

Currently, there are no challenges to carrying out a performance incentive award program as mandated by 38 U.S.C. § 4102A(c).

F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY JVSG STAFF, AS MEASURED BY PARTICIPANTS':

- employment rate in the second quarter after exit from the program;
- employment rate in the fourth quarter after exit; and
- median earnings in the second quarter after exit.

Performance Indicator	<u>PY22</u>	<u>PY23</u>	<u>PY24PY26 -27</u>
Employment Rate – 2nd Quarter After Exit	~~60%~~	~~61%~~	~~61~~ 58%
Employment Rate – 4th Quarter After Exit	~~58%~~	~~59%~~	~~59~~ 56%
Median Earnings – 2nd Quarter After Exit	~~\$9200~~	~~\$9500~~	\$10,500

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 Senior Community Service Employment Program (SCSEP) is a paid community service and

work-based program for income eligible job seekers ages 55 and older. It provides service-based training at local nonprofit organizations and government agencies to prepare them for permanent, unsubsidized employment. Due to their experience, older workers (55 and older) have considerable skills and talents to offer the State economy. According to the Minnesota State Demographic Center, the workforce will expand significantly from an increase in the number of older workers 55+ (Table 1). Yet if older workers don't remain in the workforce and their talents aren't leveraged, the labor force will shrink over the next 5-10 years. Minnesota needs to build and retain the skills of aging workers in order to sustain economic growth.

TABLE 1. MINNESOTA LABOR FORCE PROJECTIONS, 2023-2033 CHANGE PERCENT

	2023 Labor Force Projection	2033 Labor Force Projection	2020-2033 Change Numeric	2020-2033 Change Percent
55 to 64 years	524,342	443,208	-81,134	-15.5%

	2023 Labor Force Projection	2033 Labor Force Projection	2020-2033 Change Numeric	2020-2033 Change Percent
65 to 74 years	167,645	172,651	+5,006	+3.0%
75 years & over	29,343	41,861	+12,518	+42.7%
Overall 55+	721,330	657,720	-63,610	-8.8%

Source: Minnesota State Demographic Center

The Local Workforce Development Areas (LWDA), under the leadership of the Governor's Workforce Development Board, places a strong emphasis on identifying jobs in industries and occupations throughout the State that will likely provide employment opportunities for older workers. To ensure job readiness, it's vital that Minnesota DEED's SCSEP sub-grantees/operators (hereafter referred to as "providers") have access to current labor market information (LMI) that they can use to effectively assist program participants in developing realistic job goals and marketable skills sets.

SCSEP providers have access to in-service trainings through DEED's local regional labor analysts, featured publications, and online labor market tools such as: Occupational Employment Statistics Cost of Living Calculator, Occupations in Demand, Job Vacancy Survey, Career and Education Explorer, Graduate Employment Outcomes, MySkillsMyFuture, Match Jobs to Experience, O*Net OnLine, and CareerForceMN.com. These tools provide current information on the quarterly census of employment and wages, staffing patterns, employment statistics, local area unemployment statistics, comparisons (e.g. statewide and regional), business finder, and quarterly employment demographics.

PROJECTED OCCUPATIONS FOR OLDER WORKERS:

Table 2 below lists the occupations that are expected to have the most job openings from 2020 to 2030, according to DEED's employment projections data. The top 4 occupations are potentially very suitable for older workers; these include Office and Administrative Support, Food Preparation and Serving Related, Sales and Related, and Personal Care and Service. Other occupations that are projected to have an abundance of job openings that may be suitable for older workers include Building and Grounds Cleaning and Maintenance; and Installation, Maintenance, and Repair.

TABLE 2: LONG-TERM OCCUPATION PROJECTIONS, MINNESOTA, 2020 – 2030.

Title	Estimate Year Employment 2020	Projected Year Employment 2030	Percent Change	Total Change	Labor Force Exit Openings	Occupational Transfer Openings	Total Hires
Food Preparation and Serving Related Occupations	196,413	230,396	17.3	33,983	162,071	217,975	414,029
Office and Administrative Support Occupations	353,547	337,006	-4.7	-16,541	164,380	213,556	361,395
Sales and Related Occupations	272,390	265,840	-2.4	-6,550	137,391	213,165	344,006
Transportation and Material	217,673	233,084	7.1	15,411	106,855	174,737	297,003

Title	Estimate Year Employment 2020	Projected Year Employment 2030	Percent Change	Total Change	Labor Force Exit Openings	Occupational Transfer Openings	Total Hires
Moving Occupations							
Healthcare Support Occupations	165,026	195,744	18.6	30,718	110,552	106,395	247,665
Production Occupations	205,773	205,003	-0.4	-770	76,945	146,522	222,697
Management Occupations	225,287	237,754	5.5	12,467	67,446	118,849	198,762
Business and Financial Operations Occupations	194,738	206,660	6.1	11,922	52,881	117,080	181,883
Educational Instruction and Library Occupations	164,751	178,355	8.3	13,604	70,050	78,790	162,444
Personal Care and Service Occupations	85,350	97,909	14.7	12,559	57,296	71,279	141,134
Healthcare Practitioners and Technical Occupations	192,413	207,998	8.1	15,585	50,559	58,859	125,003
Building and Grounds Cleaning and Maintenance Occu	88,554	93,911	6	5,357	52,792	66,026	124,175
Construction and Extraction Occupations	120,028	124,959	4.1	4,931	36,430	82,315	123,676
Installation, Maintenance, and Repair Occupations	105,222	109,437	4	4,215	33,714	68,391	106,320
Computer and Mathematical Occupations	103,199	115,793	12.2	12,594	22,665	54,036	89,295

Title	Estimate Year Employment 2020	Projected Year Employment 2030	Percent Change	Total Change	Labor Force Exit Openings	Occupational Transfer Openings	Total Hires
Community and Social Service Occupations	65,252	72,662	11.4	7,410	23,361	44,718	75,489
Arts, Design, Entertainment, Sports, and Media Occ	50,051	54,147	8.2	4,096	19,503	32,872	56,471
Protective Service Occupations	46,767	49,561	6	2,794	21,676	30,495	54,965
Architecture and Engineering Occupations	55,462	58,392	5.3	2,930	13,817	27,807	44,554
Life, Physical, and Social Science Occupations	28,259	30,029	6.3	1,770	5,840	20,047	27,657
Farming, Fishing, and Forestry Occupations	16,818	16,596	-1.3	-222	6,965	18,898	25,641
Legal Occupations	22,327	23,964	7.3	1,637	6,339	8,952	16,928
Total, All Occupations	2,975,300	3,145,200	5.7	169,900	1,299,528	1,971,764	3,441,192

Source: <https://mn.gov/deed/data/data-tools/employment-outlook/>

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))

To identify unsubsidized jobs and the required training within occupations projected to be in high demand for older workers, SCSEP providers review LMI data regularly and work with their participants to strategize plans on how to ensure eligibility for these positions. This section describes the unsubsidized jobs within occupations projected to be in high-demand, the types of skill training for these positions, and the approach that providers take to develop a preparation plan for participants.

UNSUBSIDIZED JOBS SUITABLE FOR SCSEP PARTICIPANTS:

As listed in Table 2 in the previous section, the top 4 occupations projected to be in high demand between 2020 – 2030 include Office and Administrative Support, Food Preparation and Serving Related, Sales and Related, and

Personal Care and Service. Unsubsidized jobs within these occupations are provided in Figure 1 below. They include

Combined Food Preparers, Personal Care Aides/Assistants, Retail Salespersons, Cashiers, Servers (Waiters and Waitresses), Customer Services Representatives, Janitors and Cleaners, and Office Clerks. Other unsubsidized jobs that may be a good fit for SCSEP participants include Stock Clerks, Childcare Workers, Home Health Aides, and Nursing and Teaching Assistants.

Figure 1:



Source: <https://mn.gov/deed/data/data-tools/employment-outlook/>

SKILL TRAINING FOR IN-DEMAND JOBS:

To ensure participants are trained and well prepared to transition from subsidized to unsubsidized employment, SCSEP career counselors will continue to work diligently to identify online and local in-person training programs. Examples of unsubsidized jobs for SCSEP participants and the associated skill training are described below:

- Occupation: Office and Administration Support
- Jobs: Customer Service Representative, Office Clerk

To perform office and administrative support positions effectively, SCSEP participants complete specific training in technology programs. The acquired skills may include customer and personal service as well as proficiency in customer relationship management (CRM) software, such as Austin Logistics CallTech, Blackbaud The Raiser's Edge, or Salesforce. Preparation may also include training in database user interface and query software, such as Microsoft Access or Oracle. A high school diploma or equivalent is usually required for office and administration support jobs.

- Occupation: Food Preparation and Serving Related
- Jobs: Cashiers, Waiters/Waitresses

Candidates are usually required to have at least a high school diploma or equivalent for food preparation and serving-related positions. Some previous work-related skill, knowledge, or experience is usually needed as well. On-the-job training in these occupations is typically anywhere from a few months to a year of working with experienced

employees. Other preparation may include training in accounting or bookkeeping software, database user interface and query software such as ReliaSoft Prism, Microsoft Office, or handheld computer device software.

- Occupation: Sales and related
- Jobs: Retail Salespersons, Cashiers

As previous work-related skill, knowledge, or experience is usually needed for sales positions, SCSEP participants receive on-the-job training with experienced workers, typically lasting a few months to a year. Preparation can include training in sales and marketing, customer and personal service, persuasion, and negotiation. Additionally, training in database user interface and query software such as FileMaker Pro, gift registry software, or Microsoft Access; electronic mail software such as IBM Notes or Microsoft Outlook; or point of sale (POS) software such as iQmetrix RQ4 Retail Management System, or Plexis, may be provided. A high school diploma or equivalent is typically required.

- Occupation: Personal Care and Service
- Jobs: Home Health Aides, Nursing Assistants

To prepare SCSEP participants for a position as a Home Health Aide, career counselors identify local employers who will provide training with experienced staff to instruct on how to care for and assist others, and document and record information. Preparation typically also includes training in database user interface and query software such as Microsoft Access or Oracle; electronic mail software such as Microsoft Outlook; or medical software such as AIG OASIS. Home Health Aides usually have at least a high school diploma or equivalent.

The requirements for Nursing Assistants are typically a high school diploma or equivalent, and a post-secondary non-degree award such as a Certified Nursing Aide/Assistant (CNA). Training in accounting software such as Billing; electronic mail software such as Microsoft Outlook; and medical software such as Epic Systems may also be completed.

Source: <https://www.onetonline.org/find/>

SCSEP APPROACH TO SKILL TRAINING:

SCSEP career counselors work with, and will continue to work with, participants to develop an Individual Employment Plan (IEP) after assessing their skills and abilities. Participants' interests and aptitudes are matched with high-demand jobs in the local labor market, and an appropriate host agency for a community service assignment (CSA) is identified. The IEP lists the steps needed to achieve the job readiness goals to ensure participants will exit to an unsubsidized position.

Identification of an appropriate host agency and CSA is an ongoing process. It requires providers to be aware of local community needs, agencies/organizations that can act as hosts, and the quality of the training that the participant will receive. Participants receive most of their training at their assigned host agency. Staff provide the training at no cost to the program. They deliver it through demonstration, hands-on practice, and instruction. Host agency staff may also register participants for local in-person and online workshops and seminars. Additionally, contracts (referred to as On-the-Job Experience (OJE) contracts) are used to further develop job-related goals and interests if needed.

If it aligns with the IEP, providers identify extra vocational training for participants, including classes on time management, communication and active listening, job-searching skills, and application and interviewing techniques. These trainings may be provided by a career development specialist, where available, or taught by SCSEP counselors. To increase the likelihood of unsubsidized job placement, counselors work closely with area employers, and sometimes job developers, to identify or even create openings that meet the needs of both participants and employers.

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))

As previously discussed, the projection data shows there will be several occupations with job openings suitable for SCSEP participants up through 2030 (Table 2 and Figure 1). DEED's Match Jobs to Experience data tool and O*NET OnLine provide the typical required education level and skill sets for in-demand jobs. The skills eligible candidates possess for a sample of jobs within the top occupations predicted to be in high demand are listed below (Table 3).

TABLE 3: PROJECTED IN-DEMAND OCCUPATIONS, JOBS, AND SKILLS FOR ELIGIBLE CANDIDATES

Occupation	Unsubsidized Jobs	Education Level / Training	Skill Sets
Office and Administrative Support	• Customer Services Representatives • Office Clerks	• High school diploma or equivalent • Customer relationship management (CRM) software • Database user interface and query software • Enterprise resource planning (ERP) software	• CRM, ERP, and database user/query software proficiency • Clerical • Customer and Personal service • Communication and Active listening • Critical thinking • Team collaboration
Combined Food Preparation and Serving	• Cashiers • Waiters/Waitresses	• High school diploma or equivalent • On-the-job training with experienced workers • Accounting / bookkeeping software • Database user interface and query software • Handheld computer device software	• Customer and Personal service • Administrative and Management • Accounting / bookkeeping • Database user/query proficiency • Time management • Communication and Active Listening • Team collaboration

Occupation	Unsubsidized Jobs	Education Level / Training	Skill Sets
Sales and Related	- Retail Salespersons - Cashiers	- High school diploma or equivalent - On-the-job training with experienced workers or formal apprenticeship - Database user interface and query software - Electronic mail software - Point of sale (POS) software	- Sales and Marketing - Database user/query proficiency - Customer and Personal service - Persuasion - Negotiation - Communication and Active Listening
Personal Care and Service	- Home Health Aides - Nursing Assistants	Home Health Aides: - High school diploma or equivalent - On-the-job training or formal apprenticeship - Database user interface and query software - Electronic mail software - Medical software Nursing Assistant: - Postsecondary non-degree award, such as a CNA	- Medicine and Patient care - Customer and Personal Service - Monitoring - Public Safety and Security - Critical Thinking - Decision-making - Communication and Active Listening - Time Management

Occupation	Unsubsidized Jobs	Education Level / Training	Skill Sets
		- Accounting / bookkeeping software - Electronic mail software - Medical software	

Sources: <https://mn.gov/deed/data/data-tools/match-jobs-experience/>; <https://www.onetonline.org/find/>

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))

Through Minnesota's Combined State Plan, Minnesota SCSEP and the WIOA statewide offices will continue its partnership to ensure the maximum number of eligible individuals will have an opportunity to participate in SCSEP. MN's workforce system is comprised of 16 Local Workforce Development Areas (LWDA) and nearly 50 CareerForce locations across the state; each made up of a partnership of several employment and training programs, co-located in one building in an effort to reduce fragmentation and duplication of services. Key actions to coordinate SCSEP with other programs include the following:

CO-ENROLLMENT:

- Nearly all program providers also oversee other federal and state programs, as such providers will co-enroll participants in all available programs to ensure wholistic services are provided through blending and braiding of funding to support SCSEP participants.
- Five of the currently ~~10~~ 8 SCSEP providers in MN are Local WDAs which operate a variety of WIOA services and can co-enroll SCSEP participants seamlessly to ensure participants receive adequate support, and comprehensive training and employment services.

COLLABORATION WITH RELEVANT STAKEHOLDERS ON OUTREACH ACTIVITIES:

- Promote joint sponsorship of job fairs or other community focused events.
- Sponsor the co-development of job-readiness seminars or employment events.
- Contact local businesses and employers to serve as potential host agencies. •
- Utilize CareerForce to bring together members of senior communities through meetings, the development of resources (e.g. web resources, publications, and promotional materials) and forums (meetings and roundtables) to encourage collaboration and eliminate service gaps
- Develop SCSEP content for CareerForceMN.com that highlights the benefits of hiring older workers and supports the needs of older workers as well as partner on digital campaigns to promote the program.

REFERRALS:

- At all CareerForce locations, information about the availability of SCSEP will be made available and employment counselors will refer potential participants to SCSEP and inform them of the training opportunities available through the program.
- SCSEP providers will coordinate and make referrals to other state and national providers including the two national providers currently operating in MN: Center for Workforce Inclusion (CWI) and National Indian Council on Aging (NICOA)

CareerForce joins together providers of workforce development services to create the one-stop delivery system. The partnership brings together state, county, and private nonprofit workforce development services to provide a seamless and comprehensive system for job seekers and employers. As Minnesota's career development and talent matching resource, CareerForce connects individuals to opportunities by helping employers find the workers they need to grow and thrive. It continually works to enhance services to employees and employers, prioritizing equity at the center of everything it does. CareerForce is a business-led network of private, public, and nonprofit partners throughout Minnesota committed to helping individuals start, advance or change their career; employers attract, develop and retain talent; and Minnesota thrive economically by continuing to build its world-class workforce. In person, on the phone and online, CareerForce provides tailored resources to help meet the needs of all Minnesota's career seekers and employers.

As part of the SCSEP State Plan, DEED will continue to promote coordination and collaboration between SCSEP and the WIOA one-stop system. SCSEP providers will continue to actively partner with CareerForce. Local collaborations vary by region, ranging from the placement of SCSEP employment and training staff at statewide CareerForce sites to co-sponsoring trainings and outreach events to assisting with outreach to more rural residents of the state. Providers will also continue to collaborate with CareerForce sites at job fairs, share job leads, as well as work together to engage the business community in initiatives that tap into older workers.

Currently, Minnesota's national provider, Center for Workforce Inclusion (CWI) collaborates with WIOA One-Stop Delivery System partners to develop strategies for serving individuals aged 55 and older. By co-locating SCSEP services at selected WIOA program sites, we ensure seamless transitions and service provision across both programs. These collaborative efforts aim to increase job seekers' awareness of SCSEP and WIOA opportunities, enhancing coordination between CWI and WIOA partners. Our physical locations include CareerForce centers in Rochester, Monticello, and Anoka.

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))

MN continues to work hard toward the Age-Friendly Minnesota vision. In 2019, the Governor's Executive Order 19-38 was signed, establishing the Governor's Council on an Age-Friendly Minnesota. The Council then released eight preliminary recommendations in 2020. These recommendations continue to inform the Minnesota State Plan on Aging goals and opportunities for better collaboration and partnership between various stakeholders that support the needs of older workers across the state. Specifically, in the 2024-27 State Plan on Aging, a SCSEP specific objective was added: "increase Senior Community Service Employment Program (SCSEP) visibility through coordination with Older American Act (OAA) programs to support efforts to strengthen the direct care workforce."

The Minnesota Board on Aging is Minnesota's federally designated State Unit on Aging and are charged with ensuring older Minnesotans and their families are served effectively by state and local policies and programs, so they can age well and live well.

The MBA does this through partnerships with designated statewide network of Area Agencies on Aging (AAA). The AAAs leverage additional local dollars and resources to ensure local input and accountability in the delivery of aging services in communities around the state.

Minnesota will continue to cultivate partnerships with both MBA and AAA as well as other Older American Act (OAA) funded service providers. To increase coordination and implement the SCSEP specific objective noted in the MN State Plan on Aging, the following activities are planned:

Regular Meetings: DEED will host and facilitate quarterly meetings with MBA and AAA leaders to discuss opportunities for partnership and share updates. DEED will also invite partners to join the SCSEP monthly grantee calls to present on the various services and supports provided through their agencies. By fostering open communication and collaboration, we can identify ways to work together and identify strategies to better serve older workers.

Utilization of AAA as Host Agencies: DEED will explore the possibility of utilizing AAAs to serve as Host Agencies for SCSEP participants. This initiative will leverage the existing infrastructure and expertise of AAAs to provide comprehensive support services tailored to the needs of older workers.

Conferences and seminars: DEED will partner with MBA and AAA to host, facilitate and present at conferences aimed at providing information to statewide stakeholders serving the needs of older workers.

Outreach: DEED will partner on outreach initiatives that MBA and AAA currently have. For example, starting in 2023, the Age-Friendly Minnesota Council asked the MN Leadership Council on Aging to create and maintain this website to promote events, resources, news and stories from Age-Friendly MN Technical Assistance providers and community grantees. DEED will also develop and share SCSEP flyers for AAA to have on hand to facilitate program referrals.

DEED is committed to revitalizing collaboration with MBA and AAAs to enhance the support available to SCSEP participants. By leveraging the resources and expertise of these key stakeholders, we can better serve older workers in Minnesota and ensure they have access to the necessary tools and opportunities for success. Through proactive partnership development and strategic coordination efforts, we aim to create a more integrated and effective ecosystem for serving older workers in our state.

Minnesota's National Provider, CWI, actively engages with AAA and fosters strong relationships with their host agencies to ensure seamless collaboration and effective service delivery. They coordinate SCSEP activities with their sub-grantees, integrating initiatives conducted across the state under other titles of the Older Americans Act. CWI's strategy includes regular communication and collaboration meetings with stakeholders, sharing best practices, leveraging resources, and aligning program goals. This approach maximizes impact and supports the overall mission of the Older Americans Act.

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 assist job-seeking individuals and ensure they have access to transportation, housing, health, and other workforce development services, DEED will continue to foster partnerships with a variety of community-based organizations and referral sources.

TRANSPORTATION PROGRAMS:

To overcome transportation challenges, DEED will continue to coordinate with the Department of Transportation, partner state agencies, AAAs, transit authorities and local transportation coordination programs, such as Ticket To Work and Transit Link, to ensure SCSEP providers have resources that support participants' ability to make it to work. On the state level, a top priority area of the Governor's Council for an Age-Friendly Minnesota is transportation (see section 2 below for more information about the Governor's Council). With the guidance of several national and state transportation experts such as the AARP, Road Safety Academy, National Highway, Transportation Safety Association, and University of North Carolina Highway Safety Research Center, communities will become more livable for older individuals by creating safer and more pedestrian-friendly/walkable environments, and improving access to public transportation.

Other activities and efforts to mitigate or overcome transportation challenges include providing participants with Metro passes, gas cards, and purchasing car parts to accommodate individuals with disabilities through local

community-based support organizations. Minnesota SCSEP will continue to identify transportation challenges for participants and work with local providers and resources to identify or develop solutions.

COMMUNITY, FAITH-BASED, VOLUNTEER ORGANIZATIONS AND PROGRAMS FOR PEOPLE WITH DISABILITIES:

To ensure priority to those most-in-need (MIN), such as individuals with disabilities, DEED will coordinate activities with community, faith-based, and volunteer organizations that provide tailored resources to meet their unique needs and preferences. Strong collaborations with community action partnerships (CAP) agencies, Chambers of Commerce, city offices, Bridges of Hope, Lutheran Social Services, public libraries, Salvation Army, homeless shelters, and county social service agencies exist and provide needed support to participants. Examples of other partner organizations include:

- Living At Home Network (focuses on helping seniors maintain good health)
- Faith Community Nurse Network of the Greater Twin Cities (combines professional nursing and spiritual care)
- Centers for Independent Living (assists people with vision loss, or other disabilities, function at home, work and in their communities)

At the state level, DEED will continue to participate in the Governor's Council for an Age-Friendly Minnesota which, as previously described, coordinates public- and private-sector age-friendly actions to promote healthy aging. Other collaborations with state agencies and initiatives include:

- Minnesota Deaf and Hard of Hearing Services Division (DHHSD)
- DEED Unemployment Insurance
- DEED State Services for the Blind (SSB)
- DEED Vocational Rehabilitation Services (VRS)

DEED will continue to strengthen collaborations with community-based, faith-based, and volunteer programs as well as organizations that serve individuals with disabilities to ensure SCSEP providers and participants have easy access to needed resources.

D. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(j))

As described earlier, Minnesota provides in-service trainings with DEED's local regional labor analysts, publications, and online labor market tools such as: Occupational Employment Statistics Cost of Living Calculator, Occupations in Demand, Job Vacancy Survey, Career and Education Explorer, Graduate Employment Outcomes, MySkillsMyFuture, Match Jobs to Experience, O*Net OnLine, and CareerForceMN.com. These resources and tools provide current information on the quarterly census of employment and wages, staffing patterns, employment statistics, local area unemployment statistics, comparisons (e.g. statewide and regional), business finder, and quarterly employment demographics. Once key industries and potential jobs are identified, SCSEP providers can use this information to build employer contacts, identify or design appropriate training programs, and create employment plans with goals that are consistent with regional job opportunities.

TRAINING INITIATIVES AND OPPORTUNITIES:

DEED and its national and state providers develop strategic partnerships with workforce strategy consultants, city councils, and economic development agencies (both municipal and private) to foster collaborations with host agencies for community service and training opportunities. Other training opportunities exist through community colleges, community education providers, CareerForce locations, and retired professionals.

Minnesota also works with small businesses within the private sector to provide customized training. Over the last decade, small businesses have generated 60 to 80 percent of net new jobs annually. In many areas, small businesses may be the only source of jobs for job seekers, particularly in rural areas and when workers are low-income and elderly. Working with small businesses to provide customized training has proven to be a successful placement model.

In June 2015, the Minnesota legislature established the Job Training Incentive Program (JTIP) to cater to pressing employment needs within the state. Specifically targeting new or expanding businesses, JTIP aims to train workers swiftly and effectively. Eligible businesses must be situated in Greater Minnesota, commit to hiring permanent employees for new positions that offer a minimum of 32 hours of work per week for at least nine months annually, and provide annual wages exceeding 120% of the federal poverty guidelines (\$37,440 for 2024) for a family of four, along with benefits, by the conclusion of the training period. The program emphasizes the importance of linking long-term unemployed and disadvantaged job seekers with fresh employment prospects. Preference for funding opportunities is extended to projects prioritizing the training of long-term unemployed individuals, economically disadvantaged people of color, individuals with disabilities, and employers located in economically distressed areas. Additionally, MN state legislature has also made investments in Employer Reasonable Accommodation Fund (ERAF) which creates a central fund where small to mid-sized Minnesota employers can request reimbursement for expenses related to providing reasonable accommodations for job applicants and employees with disabilities.

Minnesota will be collaborating with current employers with the JTIP grant and applicants of the ERAF to raise awareness regarding SCSEP and explore opportunities for placements for SCSEP participants.

By partnering with small businesses, SCSEP can tap into a diverse range of opportunities that complement the employment and training needs of older adults, helping them to remain active and engaged in the workforce while contributing to the success of local businesses.

Minnesota's National provider CWI is also collaborating with other labor markets and job training initiatives through several strategic actions. Staff are actively engaging in collaborative meetings and discussions with relevant stakeholders, including local workforce development boards and vocational training providers, to identify opportunities for synergy and goal alignment.

They established partnerships with Somali Community Resettlement Services, serving as a host agency, to deliver computer skills training to SCSEP participants. CWI supplies essential tools to ensure the success of its programs. In January 2024, the Digital Certification Program (DCP) was re-launched for participants in the area. This cohort provides participants with laptops and hotspots and pairs them with a personal digital navigator. The navigator offers one-on-one support, guidance, and instruction for about 10 weeks, totaling around 10 hours per week.

To further align with labor market initiatives, steps have been taken to launch their career pathway initiative. This initiative is strategically designed to blend with the evolving demands of the labor market while prioritizing the interests of program job seekers. Its unique feature of offering prevailing wages tailored to the chosen field of the job seeker sets this initiative apart. By aligning their program with prevailing wage rates, CWI ensure that job seekers are adequately compensated as they gain valuable skills and experience.

Additionally, sub-grantees are collaborating with local job training programs, community colleges, and workforce development boards to create seamless pathways for SCSEP participants to access additional training and employment opportunities.

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)

CareerForce is Minnesota's WIOA one-stop system. It serves as Minnesota's comprehensive hub for career development and talent matching. It is a collaborative partnership between the Department of Employment and Economic Development (DEED), the Minnesota Association of Workforce Boards (MAWB), and the Governor's Workforce Development Board (GWDB).

This alliance consolidates multiple workforce development services into a single, comprehensive system, serving both job seekers and employers. CareerForce, formed through collaboration among state, county, and nonprofit organizations, offers streamlined access to employment opportunities with a focus on equity. Positioned strategically, CareerForce benefits SCSEP by providing a central hub for engagement with job seekers and employers, offering resources like training, job fairs, and outreach programs. The state, represented by DEED, takes the following strategic actions to ensure SCSEP's integration into the system.

Enhancing Coordination: As a core element of the SCSEP State Plan, DEED is dedicated to promoting collaboration between SCSEP and CareerForce. Through proactive facilitation, we aim to connect CareerForce with service providers via informative presentations and multimedia channels, ensuring seamless information dissemination and productive interactions.

Encouraging Active Partnership and Local Collaborations: DEED urges SCSEP providers to actively partner with nearby CareerForce centers, strategically located within their service areas. These partnerships facilitate direct referrals, access to training opportunities, and engagement with diverse job seeker resources. Collaborative activities may include co-sponsoring outreach events, sharing job leads, conducting outreach efforts in rural communities, and connecting providers with CareerForce's network of employers to place participants into unsubsidized employment.

Training and Resource Access: SCSEP participants are encouraged to effectively utilize CareerForce resources, such as the CareerForce job site, to enhance their job search capabilities.

By strategically aligning with CareerForce and implementing targeted actions, the state ensures that SCSEP remains an active and integrated partner within Minnesota's comprehensive one-stop delivery system, ultimately fostering enhanced employment opportunities and career advancement for older workers.

F. EFFORTS TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

Like many states across the region, MN continues to see a long trend toward greater urbanization. As the state continues to follow the trends of urbanization, aging and racial/ethnic diversification, nearly all the decline in population growth will be in primarily rural counties (Great Minnesota).

According to the Minnesota Department of Transportation's Urban and Rural Population Trend Analysis, over 80% of Minnesota's population was living in urban areas by 2016. (<https://minnesotago.org/trends/urbanization>).

Urban Minnesota, according to the Economic Research Services Rural-Urban Commuting Areas (RUCA), include 34 of the 87 counties, namely Anoka, Benton, Blue Earth, Chisago, Clay, Dakota, Dodge, Fillmore, Goodhue, Hennepin, Houston, Isanti, Kanabec, Le-Sueur, Marshall, McLeod, Mille Lacs, Mower, Nicollet, Olmsted, Pine, Polk, Ramsey, Rice, Rock, Scott, Sherburne, Sibley, St. Louis, Stearns, Wabasha, Washington, Winona, and Wright. The remaining 53 counties (or parts of) are considered rural. See Table 3.2 Below.

DEED collaborates closely with the sixteen local Workforce Development Areas (WDAs), which play a pivotal role in shaping and achieving workforce development objectives as mandated by state and federal statutes. Among DEED's Sub-recipients, five are WDAs, with three specifically catering to rural counties. Local board members within these areas serve as key community leaders, facilitating connections among various stakeholders and pooling resources to enhance the overall effectiveness of the system. The WDAs oversee the operation of the CareerForce locations in their respective counties which sometimes also house other economic development offices in the same location making opportunities for collaboration easier. Furthermore, 20 counties in rural MN are covered through state funded SCSEP, while national providers serve 38 counties, with 8 of them being served by both.

DEED partners with small businesses and invests in rural economic development through initiatives like the Job Training Incentive Program, which funds training for the long-term unemployed, disadvantaged job seekers, economically disadvantaged people of color, and individuals with disabilities. Additionally, the Automation Training Incentive Program supports rural small businesses in manufacturing and skilled production by training their workforce in new automation technologies. These efforts reflect DEED's commitment to fostering economic growth and enhancing job opportunities in rural Minnesota.

Meanwhile, CWI is actively engaged with local economic development offices in rural Minnesota counties such as Aitkin, Big Stone, Lac Qui Parle, Yellow Medicine, and Chippewa. They are forging partnerships with these offices by attending events, meetings, and summits. Last month, Aitkin County held its first annual Workforce Summit, a dynamic convergence of industry experts, local businesses, and community leaders dedicated to transforming the workforce landscape. These connections enable CWI to collaborate closely and align efforts with local economic development goals.

Awareness campaigns are being launched to educate economic development offices and local stakeholders about the benefits and opportunities offered by SCSEP. SCSEP staff attend networking events in these rural areas, and efforts are underway to organize additional networking events and fairs in partnership with economic development offices. Furthermore, training and resources are being provided to economic development staff to enhance their understanding of SCSEP and strengthen their ability to promote its services.

These partnerships offer significant benefits to SCSEP providers in rural regions, aligning with the employment and training needs of older adults. Opportunities include tailored training programs, pathways to unsubsidized employment, and active contributions to the success of local enterprises.

DEED will continue to work with chambers of commerce, economic development offices and small business development centers across rural regions, to prepare older workers for in-demand jobs, support education and training needs and promote the benefits of older workers.

Table 3.2: Minnesota SCSEP Counties Considered Rural (Source Minnesota LMI LAUS Oct 2023)

County	Population	Population 55+	Ratio 55+
Aitkin	15,859	8,264	52%
Becker	35,202	12,719	36%
Beltrami	46,274	13,319	29%
Big Stone	5,161	2,176	42%
Brown	25,880	9,345	36%
Carlton	36,362	11,780	32%
Carver	107,216	28,673	27%
Cass	30,288	13,131	43%
Chippewa	12,466	4,465	36%
Clearwater	8,541	3,010	35%
Cook	5,611	2,627	47%
Cottonwood	11,481	4,139	36%
Crow Wing	66,558	25,852	39%
Douglas	39,081	14,954	38%
Faribault	13,931	5,334	38%
Freeborn	30,857	11,592	38%

Grant	6,091	2,335	38%

County	Population	Population 55+	Ratio 55+
Hubbard	21,479	9,041	42%
Itasca	45,054	18,229	40%
Jackson	9,990	3,804	38%
Kandiyohi	43,686	14,524	33%
Kittson	4,191	1,751	42%
Koochiching	12,072	5,324	44%
Lac qui Parle	6,736	2,894	43%
Lake	10,915	4,787	44%
Lake of the Woods	3,786	1,688	45%
Lincoln	5,630	2,166	38%
Lyon	25,352	7,493	30%
Mahnomen	5,389	1,611	30%
Martin	19,960	7,787	39%
Meeker	23,352	8,204	35%
Morrison	34,023	12,033	35%
Murray	8,170	3,362	41%
Nobles	22,194	6,473	29%
Norman	6,457	2,328	36%
Otter Tail	60,072	24,200	40%
Pennington	13,995	4,566	33%
Pipestone	9,380	3,184	34%
Pope	11,312	4,612	41%
Red Lake	3,912	1,436	37%
Redwood	15,428	5,412	35%
Renville	14,707	5,361	36%
Roseau	15,294	5,219	34%
Steele	37,396	11,882	32%
Stevens	9,682	2,746	28%
Swift	9,806	3,666	37%

Todd	25,277	9,545	38%

County	Population	Population 55+	Ratio 55+
Traverse	3,345	1,328	40%
Wadena	14,108	4,733	34%
Waseca	18,953	5,913	31%
Watonwan	11,205	3,855	34%
Wilkin	6,454	2,279	35%
Yellow Medicine	9,569	3,378	35%
Total	1,095,190	390,529	36%

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.)

Engaging employers effectively is pivotal to facilitating the placement of SCSEP participants in unsubsidized employment. Here are the strategies Minnesota DEED employs and their rationale:

Developing Referral Relationships with Employers: Establishing strong partnerships with employers is fundamental to understanding their needs and preferences. By proactively cultivating these relationships, DEED position job seekers as valuable assets to businesses seeking experienced and reliable workers. This approach fosters trust and encourages employers to consider SCSEP participants for job openings. One way DEED achieves this, is through its online tool Occupations in Demand (OID), which is accessible from anywhere if there is an internet connection.

DEED's Occupations in Demand (OID) tool serves as a vital resource tailored to the needs of both job seekers and career counselors, particularly within the Dislocated Worker program. Its purpose is to offer a comprehensive view of the current job market demand, equipping individuals with insights into sought-after employment opportunities and guiding them on the necessary steps to position themselves for success in these roles. Grounded in employer-provided data, this tool not only empowers job seekers but also informs state funding decisions aimed at preparing and training individuals to meet the urgent demands of employers.

Co-enrollment of SCSEP participants into other programs: SCSEP providers also benefit from access to a range of programs, including WIOA and state-funded initiatives like Adult Career Pathways. Through co-enrollment in these programs, SCSEP participants gain access to classroom training, enhancing their prospects of securing unsubsidized employment.

Partnerships with CareerForce and Community Partners for Job Placement Activities: Collaborating with CareerForce and other community partners expands DEED's reach and resources, enabling more comprehensive job placement activities. By pooling together expertise, networks, and resources, these partnerships amplify the impact of efforts to connect SCSEP participants with unsubsidized employment opportunities.

On September 1, 2022, Governor Tim Walz unveiled a \$2.4 million investment to sustain Minnesota's initiative offering free nursing assistant training. This initiative, which encompasses complimentary training, study materials, uniforms, and certification exam fees, has successfully trained and integrated 1,370 Minnesotans into the state's healthcare workforce, fortifying its pipeline of skilled professionals. SCSEP participants with an interest in healthcare occupations stand to benefit significantly from this program.

Minnesota's CareerForce launched the "Follow Your Heart to a Caring Career " campaign, aimed at inspiring,

educating, and supporting Minnesotans interested in pursuing caregiving professions. In collaboration with the CareerForce, employers not only facilitate initial training but also potentially covers future training expenses, enabling job seekers to advance in their careers and increase their earning potential. Caring careers encompass a diverse range of roles, including providing support in homes and communities, caregiving in assisted living facilities

and nursing homes, assisting individuals in mental health care settings, and various other community-based services. SCSEP providers also gain access to a plethora of outreach resources, including job fair calendars, event templates, and informational handouts, designed to support their efforts in connecting individuals with rewarding caregiving opportunities.

Empowering, supporting, and facilitating Local Workforce Development Areas (LWDAs): LWDA receive numerous DEED funded workforce development programs to prepare and train job seekers. LWDA are distributed throughout Minnesota and as such cover both urban and rural area. They facilitate collective employer engagements through activities that further facilitate direct interactions between employers and job seekers, such as job fairs, and hiring events, which offer participants the chance to showcase their skills, capabilities, and enthusiasm for employment, thereby increasing their visibility and chances of securing job placements.

Specific strategies followed by CWI: The Center for Workforce Inclusion (CWI) tailors its approaches to urban and rural areas based on specific workforce requirements. In urban settings, CWI prioritizes forging connections with major employers and industry groups such as Lowe's and Sunrun. Conversely, in rural locales, the emphasis shifts toward fostering collaborations with small enterprises and community entities. By maintaining ongoing partnerships with economic development boards, CWI stays informed about current demand trends and ensures that SCSEP participants are equipped to fill those positions effectively.

3. THE STATE'S LONG-TERM STRATEGY FOR SERVING MINORITY OLDER INDIVIDUALS UNDER SCSEP. (20 CFR 641.302 (C))

Minnesota strives to ensure that SCSEP opportunities are spread across cultural, racial, gender, and geographic boundaries. Data in Table 3.3 shows that as a state, Minnesota serves minorities at a significantly higher level than census representation of the areas served i.e., 126% by DEED, 308% by CWI and 295% by NICOA. However, the data also shows that the Asian population, whose participation in the SCSEP program was found to be significantly low in areas served by DEED providers, although not significantly low in areas served by CWI, generally suggesting a lower than 80% service level but not necessarily significant lower participation.

To ensure this underservice is addressed, Minnesota DEED will target recruitment and enrollment efforts in counties with high Asian and Pacific Islander populations, including Anoka, Carver, Dakota, Hennepin, Olmstead, Ramsey, St. Louis, Washington, and Wright. DEED will also strengthen partnerships with National providers to address underservice, recognizing that these counties are home to over half of Minnesota's Asian population.

Providers will also continue to make it a priority to recruit and select individuals from under-resourced, minority groups. Recruitment strategies change with the climate and conditions for the older worker population, particularly minority older workers, but efforts are ongoing and persistent.

Minnesota's initiatives to serve minority populations are multifaceted including but not limited to:

Targeted Outreach: Providers are encouraged to employ and train outreach staff specifically to identify and recruit individuals from minority communities, who will collaborate closely with community leaders and organizations with expertise in serving low-income minorities. For example, recruitment efforts are tailored for Native American reservations through partnerships with organizations like NICOA, Somali Community Resettlement Services, and Minnesota Chippewa Tribe. Additionally, DEED facilitates collaboration with cultural brokers and interpreters to ensure job opportunities are accessible across cultural, racial, gender, and geographical boundaries. Translation services and program information are provided in languages including Spanish, Somali, Hmong, Vietnamese, Lao, Arabic, and Russian.

Collaboration with Partner Organizations: DEED's subgrantees work in tandem with various entities, including WIOA programs, county public assistance agencies, Vocational Rehabilitation Services, Area Agencies on Aging, and community-based organizations, to increase referrals from minority communities. CareerForce locations statewide also serve as referral hubs.

Culturally Specific Outreach: DEED's subgrantees disseminate program information through local and culturally specific channels catering to minority populations, such as Native American reservation social service organizations,

newsletters, radio and television outlets (e.g., Insight News, Minnesota Spokesman Recorder, The Circle, Latino Midwest News, Asian American Press, JMOJ), grocery stores, public assistance case workers, public health workers, clergy, and rural neighborhood workers.

Supportive Services: DEED encourages subgrantees to offer various support services addressing barriers to employment for minority participants, including transportation assistance, free meals, wellness classes, legal aid, elder-abuse prevention, and tax preparation.

Technical Assistance and Monitoring: DEED provides continuous technical assistance to subgrantees, aiding them in identifying successful recruitment strategies and approaches for minority individuals. Additionally, DEED closely monitors GPMS data and the DOL's annual report on services to minorities to evaluate the state's efforts and identify areas for improvement.

Through these endeavors, DEED endeavors to ensure equal access to SCSEP opportunities for individuals from minority populations, fostering socio-economic advancement. This steadfast commitment to equity and inclusivity is anticipated to yield positive changes in enrollment levels and outcomes for SCSEP minority participants.

TABLE 3.2: SCSEP SERVICE TO MINORITY INDIVIDUALS (SCSEP MINORITY REPORT PY 2022 VII USDOL ETA – CHARTER OAK GROUP, LLC)

Minnesota	Population Census %	SCSEP %	Difference	Less than 80%	Significant (P<.05)	Less than 80%. Sign
Minority Overall	13.90%	17.60%	126.60%	0	0	0
Hispanic	2.70%	3.10%	114.60%	0	0	0
Black	5.90%	10.90%	184.70%	0	0	0
Asian	2.30%	0.50%	27.70%	1	1	1
American Indian	1.60%	2.60%	162.50%	0	0	0
Pacific Islander	0.10%	0.00%	N/A	N/A	N/A	N/A
National - CWI						
Minority Overall	19.60%	60.50%	308.70%	0	0	0
Hispanic	2.70%	2.20%	81.50%	0	0	0
Black	9.80%	54.30%	554.10%	0	0	0
Asian	3.40%	2.20%	64.70%	1	0	0
American Indian	1.90%	1.30%	68.40%	1	0	0
Pacific Islander	0.10%	0.00%	N/A	N/A	N/A	N/A
National NICOA - Set aside						
Minority Overall	31.20%	92.30%	295.80%	0	0	0

Minnesota	Population Census %	SCSEP %	Difference	Less than 80%	Significant (P<.05)	Less than 80%. Sign
Hispanic	3.50%	0.00%	0%	1	1	1
Black	18.30%	30.80%	168.30%	0	0	0
Asian	5.40%	0.00%	0.00%	1	1	1
American Indian	1.80%	61.50%	3416.70%	0	0	0
Pacific Islander	0.00%	0.00%	N/A	N/A	N/A	N/A

Note: Service less than 80% + difference statistically significant at below 0.5 Level = Significant lower rate of Participation.

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)

Using current LMI data on the unemployment rates for Minnesota, we're able to identify the SCSEP counties with unemployment rates above the state average (3.2% - 3.3%). As of October 2023, these counties included: Cottonwood County at 4.8 percent, Koochiching at 3.9 percent, Aitkin at 3.7 percent, Clearwater at 3.6 percent, Hubbard, Mahnomon, and Mille Lacs at 3.5 percent, Itasca, Lake, Pine, Wadena, and Waseca at 3.4 percent. For more detailed information, see Table 4 in section (c)(1) below.

The community or support services SCSEP participants, particularly MIN individuals, tend to access are often transportation support (gas cards or bus passes), and housing and food assistance. SCSEP participants also need professional clothing so they can dress appropriately for interviews, meetings, CSAs, and eventual employment. Partner agencies and organizations that provide needed support services to program participants include, but are not limited to:

- Ticket To Work
- Transit Link
- Fare For All
- Dress for Success
- Project for Pride in Living
- Community Action Partnership
- Senior Linkage Line
- Supplemental Nutrition Assistance Program (SNAP)
- Area food shelves
- Chambers of Commerce
- Arrowhead Area Agency on Aging – Duluth, MN
- Central Minnesota Council on Aging – Sartell, MN
- Dancing Sky Area Agency on Aging – Warren, MN
- Metropolitan Area Agency on Aging – Arden Hills, MN

- Minnesota Indian Area Agency on Aging – Cass Lake, MN
- Minnesota River Area Agency on Aging – Mankato, MN
- Southeastern Minnesota AAA – Rochester, MN

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))

Minnesota's long-term strategy to enhance SCSEP services involves both state-led initiatives and direct actions by the Department of Employment and Economic Development (DEED). This approach aims to improve program design, optimize the use of SCSEP grantees, and achieve the program's goals more effectively.

Government Programs to Promote an Age-Friendly Minnesota:

Governor's Initiatives: Governor Walz supports initiatives to positively impact older Minnesotans. In 2019, the Age-Friendly Minnesota Council was established, and in August 2020, it submitted a preliminary report with recommendations for prioritizing aging in the state. The council's continuation through 2024 was approved during the 2021 Special Session.

AARP Network Membership: In January 2022, Minnesota joined the AARP Network of Age-Friendly States and Communities, becoming the 10th state in the network. This initiative raises awareness of programs for older workers and supports the SCSEP.

Outreach and Collaboration Strategies:

Encourage Minority-Led Organizations: DEED is increasing services to minorities by encouraging providers to hire staff from or work with host agencies representing the communities they serve. For example, Somali Community Resettlement Services (SCRS) became a DEED sub-grantee in 2022, enhancing services to minority communities.

Engage Local Businesses: A dedicated team will reach out to local businesses to serve as host agencies for SCSEP participants. Promotional materials and informational sessions will be created to highlight the benefits of hiring older workers.

Joint Sponsorship of Community Events: DEED will plan and execute joint job fairs, employment workshops, and community events targeting older workers. These events will be well-publicized through various media and online platforms, with local businesses and industries encouraged to participate.

Develop Job-Readiness Seminars: DEED will collaborate with stakeholders to create job-readiness seminars for older workers, covering resume writing, interview skills, and technology use. CareerForce locations will be used as venues for these seminars.

Resource Development and Dissemination: DEED will develop resources tailored to older workers, such as guides, brochures, and online content on CareerForceMN.com. Forums, roundtables, and community meetings will be conducted to foster collaboration among senior communities and service providers.

Improving Data Collection and Case Management Systems:

System Integration: DEED plans to integrate Workforce One with the SCSEP's Grantee Performance Management System (GPMS) to streamline data entry and management. This integration will enhance co-enrollment processes and improve case management.

Performance Monitoring: DEED will collaborate with CWI and NICOA to monitor, evaluate, and use GPMS performance reports to identify areas for improvement and enhance services for participants.

Co-Enrollment Strategies:

Unified Enrollment System: DEED will integrate program enrollment processes across SCSEP and WIOA programs to streamline participant intake and facilitate seamless co-enrollment.

Maximizing Funding Utilization: DEED will establish protocols for blending and braiding funding sources to provide comprehensive support services.

Collaboration with National Grantees: DEED will encourage the Center for Workforce Inclusion (CWI) and the National Indian Council on Aging (NICOA) to collaborate with Workforce Development Areas (WDAs) to utilize co-enrollment opportunities.

Referral Strategies:

Information Sharing at CareerForce Locations: DEED will ensure all CareerForce locations have up-to-date information about SCSEP and its benefits. Employment counselors will be trained to refer eligible individuals to SCSEP and inform them about available training opportunities. A referral tracking system will be developed to monitor effectiveness.

Coordinate with National Providers: DEED will establish formal partnerships with CWI and NICOA to facilitate referrals and share resources. Regular meetings will be scheduled to discuss coordination strategies and improve participant outcomes.

Coordinate with Area Agencies on Aging (AAA): DEED will utilize the AAA network to increase referrals by sharing data on available slots and connecting SCSEP providers with AAA for facilitated referrals.

Program Design and Administrative Efficiency:

Consolidation of Service Delivery Areas: DEED will develop and implement a consolidation strategy to reduce the number of providers, enabling each provider to serve a larger, contiguous geographic area. This approach will streamline service delivery, improve efficiency, and ensure better resource allocation across counties.

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By implementing these strategies, Minnesota aims to create a more integrated, efficient, and effective system to support older workers through SCSEP and related programs, thereby improving their employment outcomes and overall quality of life.

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))

Minnesota SCSEP will continue to utilize GPMS performance reports to monitor and evaluate participant entry into unsubsidized employment. Each quarter, performance outcomes will be communicated to all subgrantees to facilitate visibility of how each subgrantee compares with the others, as well as how each contributes to the state performance goals. This facilitates the identification of areas for improvement and the development of strategies to capitalize on opportunities.

Furthermore, our annual monitoring events represent a pivotal opportunity to further identify best practices. DEED intends to disseminate these identified best practices to all subgrantees as a strategy to foster collaboration among providers, allowing them to learn from one another's experiences.

Minnesota SCSEP will also maintain its collaboration with CareerForce, Minnesota's WIOA one-stop system, to showcase SCSEP participants. Providers are encouraged to ensure that all participants create a personal account with CareerForce's job seekers portal. CareerForce facilitates the matching of job seekers to the employer network hosted by the site, with the expectation that employees will find suitable employment when they possess the requisite skills.

The Job Training Incentive Program (JTIP) in Minnesota was established to cater to new or expanding businesses,

aiming to train workers swiftly and effectively. JTIP targets businesses in rural areas of Minnesota to increase permanent employment positions offering full-time roles with annual wages exceeding 120% of the federal poverty guidelines. Given that JTIP funding preference is granted to organizations offering training to long-term unemployed individuals, economically disadvantaged people of color, individuals with disabilities, and employers in economically distressed areas, it aligns well with SCSEP participants and presents opportunities for On-the-Job Experience (OJE).

While OJE has not been effectively utilized by SCSEP providers in the past, Minnesota DEED plans to raise awareness among SCSEP providers of the significant advantages available through intentional collaboration with JTIP grant beneficiaries. This includes inviting successful organizations to meet with providers during quarterly meetings.

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))

Using current LMI data, we’re able to identify the SCSEP counties with unemployment rates above the state average of 3.2 percent in 2023. As of October 2023, these counties included: Cottonwood County at 4.8 percent, Koochiching at 3.9 percent, Aitkin at 3.7 percent, Clearwater at 3.6 percent, Hubbard, Mahnommen, and Mille Lacs at 3.5 percent, Itasca, Lake, Pine, Wadena, and Waseca at 3.4 percent. (Table 4).

TABLE 4: SCSEP COUNTIES BY LABOR FORCE, EMPLOYMENT, UNEMPLOYMENT, AND UNEMPLOYMENT RATE

MN County	Labor Force	Employment	Unemployment	Unemployment Rate
Aitkin County	7,488	7,211	277	3.70%
Anoka County	199,995	194,348	5,647	2.80%
Becker County	19,731	19,296	435	2.20%
Beltrami County	25,233	24,548	685	2.70%
Benton County	21,695	21,107	588	2.70%
Big Stone County	2,472	2,408	64	2.60%
Blue Earth County	43,389	42,492	897	2.10%
Brown County	13,922	13,597	325	2.30%
Carlton County	17,707	17,188	519	2.90%
Carver County	60,101	58,543	1,558	2.60%
Cass County	14,704	14,258	446	3%
Chippewa County	6,389	6,235	154	2.40%
Chisago County	30,110	29,277	833	2.80%
Clay County	37,807	37,077	730	1.90%
Clearwater County	4,544	4,379	165	3.60%
Cook County	2,877	2,801	76	2.60%
Cottonwood County	7,043	6,707	336	4.80%
Crow Wing County	33,706	32,735	971	2.90%
Dakota County	244,111	237,492	6,619	2.70%
Dodge County	12,303	12,010	293	2.40%
Douglas County	21,576	21,057	519	2.40%

MN County	Labor Force	Employment	Unemployment	Unemployment Rate
Faribault County	7,372	7,191	181	2.50%
Fillmore County	11,921	11,667	254	2.10%
Freeborn County	16,301	15,863	438	2.70%
Goodhue County	26,943	26,286	657	2.40%
Grant County	3,376	3,300	76	2.30%
Hennepin County	711,402	690,210	21,192	3%
Houston County	10,756	10,517	239	2.20%
Hubbard County	10,243	9,880	363	3.50%
Isanti County	21,784	21,156	628	2.90%
Itasca County	21,358	20,630	728	3.40%
Jackson County	5,553	5,402	151	2.70%
Kanabec County	9,225	8,933	292	3.20%
Kandiyohi County	23,094	22,602	492	2.10%
Kittson County	2,328	2,267	61	2.60%
Koochiching County	5,664	5,443	221	3.90%
Lac qui Parle County	3,539	3,469	70	2%
Lake County	5,124	4,952	172	3.40%
Lake of the Woods County	2,373	2,297	76	3.20%
Le Sueur County	16,013	15,587	426	2.70%
Lincoln County	3,107	3,055	52	1.70%
Lyon County	14,516	14,229	287	2%
Mahnomen County	2,315	2,234	81	3.50%
Marshall County	5,538	5,411	127	2.30%
Martin County	9,709	9,441	268	2.80%
McLeod County	19,338	18,827	511	2.60%
Meeker County	13,905	13,571	334	2.40%
Mille Lacs County	12,672	12,234	438	3.50%
Morrison County	17,298	16,812	486	2.80%
Mower County	21,000	20,471	529	2.50%

MN County	Labor Force	Employment	Unemployment	Unemployment Rate
Murray County	4,779	4,650	129	2.70%
Nicollet County	22,360	21,893	467	2.10%
Nobles County	11,171	10,864	307	2.70%
Norman County	3,272	3,194	78	2.40%
Olmsted County	93,176	91,151	2,025	2.20%
Otter Tail County	31,270	30,470	800	2.60%
Pennington County	8,741	8,554	187	2.10%
Pine County	14,186	13,706	480	3.40%
Pipestone County	4,874	4,778	96	2.00%
Polk County	16,626	16,249	377	2.30%
Pope County	6,599	6,458	141	2%
Ramsey County	287,520	279,090	8,430	2.90%
Red Lake County	2,173	2,122	51	2.30%
Redwood County	7,733	7,525	208	2.70%
Renville County	8,586	8,365	221	2.60%
Rice County	37,793	36,909	884	2.30%
Rock County	6,191	6,082	109	1.80%
Roseau County	7,871	7,665	206	2.60%
Saint Louis County	101,074	98,147	2,927	2.90%
Scott County	85,137	82,843	2,294	2.70%
Sherburne County	53,411	51,935	1,476	2.80%
Sibley County	8,351	8,134	217	2.60%
Stearns County	90,433	88,157	2,276	2.50%
Steele County	18,606	18,038	568	3.10%
Stevens County	5,456	5,339	117	2.10%
Swift County	4,953	4,811	142	2.90%
Todd County	13,878	13,477	401	3%
Traverse County	1,703	1,661	42	2.50%
Wabasha County	12,675	12,386	289	2.30%
Wadena County	6,147	5,935	212	3.40%

MN County	Labor Force	Employment	Unemployment	Unemployment Rate
Waseca County	8,734	8,433	301	3.40%
Washington County	146,069	142,255	3,814	2.60%
Watsonwan County	6,830	6,677	153	2.20%
Wilkin County	3,605	3,527	78	2.20%
Winona County	28,766	28,078	688	2.40%
Wright County	77,217	75,234	1,983	2.60%
Yellow Medicine County	5,128	4,995	133	3%

DEED will work with SCSEP providers in these areas to strengthen strategies to increase employment opportunities. Current objectives and strategies include:

- Utilize the equitable distribution report provided on www.SCSEPed.org to monitor and track equitable distribution
- Recruit host agencies in underserved counties
- Conduct outreach to participants who have the greatest barriers to employment in underserved areas
- Enroll more participants in underserved areas and close enrollments in over-served areas
- Increase specialized training and job development activities in underserved areas
- Discuss the potential to move state program participants located in over-served areas to the national program
- Advertise within local community papers, utilizing TV PSA's, providing flyers, pamphlets, and other marketing tools that will aid in educating city/county government agencies
- Strengthen partnerships with agencies, employers, city/county officials, and community organizations that focus on community improvement and employment for older workers

With many seniors postponing retirement and seeking new work opportunities, it is critical to partner with all possible workforce participants to increase accessible and suitable positions.

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.

There are 2 national and 10 state SCSEP ~~providers-grantees~~ in Minnesota. The national grantees include CWI, and NICOA. DEED sub-grants program services to the following 10-8 providers: Anoka County Job Training Center, Arrowhead Economic Opportunity Agency (AEOA), City of Duluth, Minnesota Chippewa Tribe (MCT), Minnesota Valley Action Council (MVAC), National Able Network Inc., Rural MN CEP, ~~Scott County Health and Human Services, Somali Community Resettlement Services (SCRS),~~ and Southwestern Minnesota Opportunity Council (SMOC).

Minnesota uses Census data by county and annual program appropriations to calculate the number of authorized positions, or slots, that are allocated to each county. The number of authorized positions is proportional to the number of eligible people in the county compared to the eligible state population. For every authorized position, one or more individuals can receive services during the program year. Table 5 below lists Minnesota's SCSEP providers

TABLE 5: MINNESOTA SCSEP PROVIDERS, PY23 AUTHORIZED POSITIONS, AND COUNTIES SERVED

963 Total Authorized Positions – 87 Counties Statewide

MN SCSEP Providers – State and National	City	PY23 Authorized Positions (AP)	Change in AP	Counties Served
State - Anoka County Job Training Center	Blaine	~~19~~ 7 State	~~+1~~ 0	Anoka.
State - Arrowhead Economic Opportunity Agency	Virginia	~~6~~ 7 State	~~+2~~ 1	Itasca, Koochiching.
State - City Of Duluth Workforce Development	Duluth	10 State	0	St. Louis.
~~State - InterCounty Community Council (ICCC)~~	~~Oklee~~	~~0~~ State	~~-7~~	~~Retired at end of PY22 (last year)~~
State - Minnesota Chippewa Tribe	Cass Lake	5 State	0	Becker, Mahnommen, Mille Lacs.
State - Minnesota Valley Action Council	Mankato	~~38~~ 43 State	~~+1~~ 5	Blue Earth, Brown, Faribault, Martin, Nicollet, ~~Scott~~ , Watonwan
State - National Able Network Inc.	Golden Valley	~~62~~ 74 state	~~+3~~ 12	Carver, Dakota, Hennepin, Goodhue, Pennington, Polk, Rice, Wabasha, Winona.
State - Rural Minnesota CEP, Inc.	Detroit Lakes	15 State	~~+20~~	Becker, ~~Beltrami~~ , ~~Cass~~ , Clay, Clearwater, Crow Wing, Douglas, Grant, ~~Hubbard~~ , Lake of the Woods, Mahnommen, ~~Morrison~~ , Otter Tail, ~~Pope~~ , Stevens, Pennington, Polk, Todd, Traverse, Wadena, ~~Wilkin~~
State - Scott County Workforce Center	Shakopee	~~5~~ 0 State	~~0~~ 5	~~Scott~~ Retired in PY24
State - Southwestern Minnesota Opportunity Council	Worthington	~~21~~ 19 State	~~0~~ 2	Cottonwood, Jackson, Murray, Nobles, Pipestone, Rock

MN SCSEP Providers – State and National	City	PY23 Authorized Positions (AP)	Change in AP	Counties Served
State - Somali Community Resettlement Services	Minneapolis	~~16~~ 0 State	~~0~~ 16	~~Washington, Olmstead~~ Retired in PY23
National - Center for Workforce Inclusion (CWI) – Anoka County Job Training Center	Blaine	~~25~~ 0 National	~~0~~ 5	~~Anoka~~ Retired in PY25
National - Center for Workforce Inclusion (CWI) – Duluth Workforce Development	Duluth	~~0~~ 26 National	~~0~~ 139	~~St. Louis~~ Retired in PY25
National - Center for Workforce Inclusion (CWI) – East Side Neighborhood Service, Inc.	Minneapolis	~~0~~ 181 National	~~0~~ 10	~~Hennepin~~ Retired in PY25
National - Center for Workforce Inclusion (CWI) – Motivation, Education & Training	Monticello, Rochester, and St Paul.	~~516~~ 729 National	~~+1~~ 213	Aitkin, ~~Anoka~~ , Becker, Beltrami, Benton, Big Stone, Carlton, Cass, Chippewa, Chisago, Clay, Clearwater, Cook, Crow Wing, Dakota, Dodge, Douglas, Fillmore, Freeborn, Goodhue, ~~Hennepin~~ , Houston, Hubbard, Isanti, Itasca, Kanabec, Kandiyohi, Kittson, Koochiching, Lac qui Parle, Lake, Lake of Woods, Le Sueur, Lincoln, Lyon, McLeod, Marshall, Meeker, Mille Lacs, Morrison, Mower, Norman, Olmsted, Otter Tail, Pennington, Pine, Polk, Pope, Redwood, Renville, Rice, Roseau, Sherburne, Sibley, ~~St Louis~~ , Stearns,

				Steele, Swift, Todd,

MN-SCSEP Providers— State and National	City	PY23 Authorized Positions (AP)	Change in AP	Counties Served
				Traverse, Wabasha, Wadena, Waseca, Washington, Wilkin, Winona, Wright, Yellow Medicine.
National - National Indian Council on Aging	Albuquerque, NM	19-43 National	240	Carlton, Hennepin, Hennepin, Koochiching, Ramsey, and St. Louis

**3. DESCRIBE CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE
EQUITABLE DISTRIBUTION.**

Counties consistently show larger positive variances due to increased participant need and interest, alongside the proximity of host agencies to sub-grantee staff. This proximity fosters increased participant engagement and reduces premature exits. Conversely, counties with consistently larger negative variances are mainly rural, marked by extensive distances between settlements and host agencies, as well as significant remoteness from grantee staff. Participants in these areas often require substantial support services to maintain engagement.

In the second quarter of PY2023, Minnesota DEED identified Itasca, Martin, and Olmstead counties as consistently exhibiting larger positive variances. Consequently, they instructed providers to temporarily freeze new enrollments in these counties and redirect efforts towards under-enrolled areas. Simultaneously, efforts are underway to strengthen enrollments in Carver and Dakota counties, which face simultaneous exits due to duration limits. The sub-grantee serving these counties, 'National Able,' has already initiated targeted outreach efforts and will continue to do so to strengthen enrollments and fill vacant positions.

CWI has observed instances of over-enrollment primarily driven by increased participant need and interest, notably in counties such as Olmsted, Ramsey, Rice, and Stearns. Conversely, under-enrollment persists in other areas, primarily due to transportation challenges, limited participant interest, and a scarcity of host agencies meeting SCSEP criteria. Counties like Isanti, Chisago, and Norman are particularly affected.

To rectify these imbalances and achieve equitable distribution, CWI is implementing a range of strategies. These include developing targeted outreach efforts to attract participants from under-enrolled areas, addressing transportation assistance in collaboration with local CareerForce, expanding outreach efforts to identify new host agencies, and seeking referrals from current partners. Additionally, CWI is organizing community engagement sessions in under-enrolled areas to raise awareness about the program, address concerns, and solicit feedback on how to better meet community needs.

Most recently, CWI convened a meeting with Christine Wilkes, the Executive Director of the Cambridge Senior Activity Center and Friendship Café, a prominent institution catering to seniors aged 55 and above. Discussions centered on potential partnerships, community events, and the needs of their clientele. This meeting marks the inception of what CWI hopes will be a fruitful relationship in Isanti County.

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.

Basing on the analysis of PY2023 GPMS Equitable Distribution report, 50% of counties served by Minnesota DEED and 45% served by CWI are considered underserved. Conversely, 13 counties served by Minnesota DEED and 14% served by CWI are classified as overserved.

To ensure equitable distribution in underserved areas, Minnesota DEED has initiated collaborative efforts with CWI. These efforts involve further data analysis and the utilization of LMI unemployment reports to identify patterns of underservice. Tailored outreach and recruitment strategies are being developed to attract participants in the typically hard-to-reach underserved counties.

DEED and CWI have also initiated meetings to discuss slot reallocations, aiming for better alignment with subgrantees and partners to enhance efficiency. This includes collaborating with local partners to identify areas with the greatest need and adjusting slot allocations accordingly.

DEED plans to leverage the widely distributed network of Workforce Development Areas (WDAs) to raise awareness about SCSEP services in communities. Providers not directly affiliated with WDAs will be encouraged to forge partnerships with them to benefit from consolidated outreach programs facilitated by WDAs.

Minnesota DEED will also extend invitations to Area Agencies on Aging (AAA) representatives to its quarterly meetings and occasionally seek collaboration with them to discuss and share ways of ensuring that those in need of SCSEP services are reached and given access to the program.

Furthermore, Minnesota DEED will intentionally promote co-enrollment of SCSEP participants to access support services from other WIOA and non-WIOA funded programs. This strategy aims to increase participant retention, particularly for those who would have dropped out of the program due to transportation barriers—an impediment commonly faced in rural areas of Minnesota due to the lack of public transportation, among other support service needs.

B. EQUITABLY SERVES RURAL AND URBAN AREAS.

According to the American Community Survey (ACS) of 2022, Minnesota's population is estimated at 5,695,292 people, and has over 80% of its residents living in urban areas, which constitute about 20% of the state's geographical area. Conversely, rural areas, despite encompassing a larger portion of the state, often face higher unemployment rates and several unique challenges. These challenges include limited transportation options for both service providers and participants, fewer high-wage industries, and a scarcity of host agency opportunities. Such factors complicate efforts to recruit and retain SCSEP participants in rural areas, hindering their ability to acquire or improve skills necessary for the limited available positions.

To address these disparities, the Minnesota Department of Employment and Economic Development (DEED) is implementing a multi-faceted strategy:

Co-Enrollment with Other Programs: DEED encourages providers to co-enroll SCSEP participants in other Workforce Innovation and Opportunity Act (WIOA) and non-WIOA programs. This approach allows participants to access additional support services and funding, helping to alleviate barriers to participation.

Utilizing Workforce Development Areas (WDAs): Providers are encouraged to leverage the statewide network of Workforce Development Areas to enhance outreach efforts. This consolidated approach has proven effective in informing rural communities about SCSEP. DEED also urges providers not directly affiliated with WDAs to establish relationships with them to explore additional opportunities.

Partnerships with Area Agencies on Aging (AAAs): DEED plans to engage Area Agencies on Aging to utilize their infrastructure for outreach in hard-to-reach communities. Providers will be encouraged to form partnerships with AAAs serving the same communities to maximize resource sharing and outreach effectiveness.

Tailored Outreach and Service Delivery: The Career and Workforce Innovation (CWI) team is customizing outreach and service delivery strategies to address the specific challenges and opportunities in both rural and urban areas. This involves leveraging existing partnerships, creating new ones, and securing resources to ensure SCSEP services are accessible to all eligible individuals, regardless of their location.

Monitoring and Continuous Improvement: DEED will use GPMS reports to monitor enrollment trends in both rural and urban areas. These reports will be shared with subgrantees and national providers to identify challenges, best practices, and opportunities for continuous improvement.

Through these strategic efforts, Minnesota DEED aims to achieve a more equitable distribution of SCSEP positions, ensuring that both rural and urban communities are effectively served.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

Priority groups include those who are 65 or older, have a disability, are limited English proficient or have low literacy skills, reside in a rural area, have veteran status (or in some cases, spouses of veterans), have low employment prospects, have failed to find employment after using services provided through the WIOA one-stop delivery system, released from incarceration in the last five years, and are homeless or are at risk of homelessness. To ensure an equitable distribution of slots that serve and support these individuals, Minnesota will continue to customize promotional and outreach campaigns that address their unique needs and preferences. The Center, NICOA and DEED will use recruitment strategies that have proven to be effective such as hiring outreach staff to identify and recruit Most In Need (MIN) individuals, work closely with WIOA and CAPs to increase referrals, and disseminate program information to local and culturally-specific agencies and outlets that serve MIN populations. We will also continue to provide technical assistance to, collaborate with and evaluate the efforts of providers. See section (b)(3) above for information about services to minority individuals under SCSEP.

5. THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

The total number of Minnesotans 55 years of age and older is anticipated to increase by nearly 500,000 people between the 2018 American Community Survey (ACS) 5-year estimates and the 2040 population projections, as supplied from the Minnesota State Demographic Center. As such, the population 55 years of age and older in Minnesota is projected to expand by 32 percent, or 2.5 times faster than total population growth in the state (13 percent). By 2040, approximately one-third of Minnesotans will be 55 years of age and older. By 2040, approximately one-fifth of Minnesotans will be 65 years of age and older.

According to the 202 ACS survey, twice as many Minnesotan older women live in poverty than men, with 17% of men relying exclusively on Social Security compared to over 33% of women. Nationally, SCSEP is currently funded at a level to serve only .05 percent of the eligible population yet these trends underscore the importance of the SCSEP, the only federal training program that serves low-income older workers on Minnesota’s workforce menu of programs.

See Table 6 for the ratio of eligible individuals in each Minnesota SCSEP service area to the total eligible population.

TABLE 6: RATIO OF ELIGIBLE INDIVIDUALS IN MINNESOTA SERVICE AREAS TO TOTAL ELIGIBLE POPULATION

County	Ratio	Population 55+	Total Population
Total	30%	1,695,432	5,695,292
Aitkin	52%	8,264	15,859
Anoka	29%	104,059	363,985
Becker	36%	12,719	35,202
Beltrami	29%	13,319	46,274
Benton	26%	10,636	41,300
Big Stone	42%	2,176	5,161
Blue Earth	25%	17,120	69,022
Brown	36%	9,345	25,880

County	Ratio	Population 55+	Total Population
Carlton	32%	11,780	36,362
Carver	27%	28,673	107,216
Cass	43%	13,131	30,288
Chippewa	36%	4,465	12,466
Chisago	31%	17,665	56,927
Clay	24%	15,599	65,307
Clearwater	35%	3,010	8,541
Cook	47%	2,627	5,611
Cottonwood	36%	4,139	11,481
Crow Wing	39%	25,852	66,558
Dakota	28%	125,027	439,179
Dodge	28%	5,912	20,893
Douglas	38%	14,954	39,081
Faribault	38%	5,334	13,931
Fillmore	36%	7,624	21,251
Freeborn	38%	11,592	30,857
Goodhue	35%	16,821	47,697
Grant	38%	2,335	6,091
Hennepin	27%	346,143	1,270,787
Houston	38%	7,212	18,826
Hubbard	42%	9,041	21,479
Isanti	31%	12,946	41,257
Itasca	40%	18,229	45,054
Jackson	38%	3,804	9,990
Kanabec	37%	5,988	16,145
Kandiyohi	33%	14,524	43,686
Kittson	42%	1,751	4,191
Koochiching	44%	5,324	12,072
Lac qui Parle	43%	2,894	6,736
Lake	44%	4,787	10,915

County	Ratio	Population 55+	Total Population
Lake of the Woods	45%	1,688	3,786
Le Sueur	33%	9,361	28,795
Lincoln	38%	2,166	5,630
Lyon	30%	7,493	25,352
McLeod	33%	12,286	36,727
Mahnomen	30%	1,611	5,389
Marshall	37%	3,328	9,017
Martin	39%	7,787	19,960
Meeker	35%	8,204	23,352
Mille Lacs	33%	8,849	26,680
Morrison	35%	12,033	34,023
Mower	31%	12,365	40,082
Murray	41%	3,362	8,170
Nicollet	29%	9,977	34,380
Nobles	29%	6,473	22,194
Norman	36%	2,328	6,457
Olmsted	29%	46,450	162,307
Otter Tail	40%	24,200	60,072
Pennington	33%	4,566	13,995
Pine	38%	11,056	29,090
Pipestone	34%	3,184	9,380
Polk	33%	10,143	31,128
Pope	41%	4,612	11,312
Ramsey	27%	147,770	547,202
Red Lake	37%	1,436	3,912
Redwood	35%	5,412	15,428
Renville	36%	5,361	14,707
Rice	29%	19,357	67,152
Rock	34%	3,257	9,659
Roseau	34%	5,219	15,294

County	Ratio	Population 55+	Total Population
St. Louis	35%	69,347	200,122
Scott	24%	36,749	151,347
Sherburne	24%	23,668	97,820
Sibley	34%	5,121	14,950
Stearns	28%	43,914	158,622
Steele	32%	11,882	37,396
Stevens	28%	2,746	9,682
Swift	37%	3,666	9,806
Todd	38%	9,545	25,277
Traverse	40%	1,328	3,345
Wabasha	38%	8,193	21,460
Wadena	34%	4,733	14,108
Waseca	31%	5,913	18,953
Washington	30%	79,454	268,651
Watonwan	34%	3,855	11,205
Wilkin	35%	2,279	6,454
Winona	30%	15,182	49,792
Wright	25%	36,324	142,543
Yellow Medicine	35%	3,378	9,569

Source: U.S. Census Bureau, 2023 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 the MN Demographic Center, the number of Minnesotans turning 65 in this decade (about 285,000) will be greater than the past four decades combined.

In 2020, Minnesota's 65+ population is expected to eclipse the 5-17 K-12 population, for the first time in history. The total number of older adults (65+) is anticipated to double between 2010 and 2030, according. By then, more than 1 in 5 Minnesotans will be an older adult.

Rural Minnesota is already older than the state as a whole and older than the Twin Cities metro area (urban). This trend will only continue into the future. In 2030, about 22.6% of Greater Minnesota's population will be 65+ compared to 20.6% for the state as a whole and 19% for the Metro Area.

The breakdown of Minnesota's 55 and older population by urban vs rural status is listed in Table 7 below.

TABLE 7: MINNESOTA'S 55 AND OLDER POPULATION BY URBAN AND RURAL STATUS

	Urban	Rural
55 to 64 years	64.20%	35.80%
65 to 74 years	60.70%	39.30%
75 years & over	56.80%	43.20%

B. HAVE THE GREATEST ECONOMIC NEED

According to the U.S. Bureau of Labor Statistics, Minnesota’s overall poverty rate averaged about 3.2 percent in 2023. As discussed in section (c)(1) earlier, the SCSEP counties with unemployment rates above the state average included: Cottonwood County at 4.8 percent, Koochiching at 3.9 percent, Aitkin at 3.7 percent, Clearwater at 3.6 percent, Hubbard, Mahnomen, and Mille Lacs at 3.5 percent, Itasca, Lake, Pine, Wadena, and Waseca at 3.4 percent. (Table 5).

Table 8 lists the state counties with unemployment rates above average and their ratio of eligibility to the total population. Every county with a high unemployment rate also has a potentially SCSEP-eligible population (based on the age criterion of 55+) of at least 31%. Hubbard, Koochiching, and Lake of the Woods have SCSEP-eligible populations of at least 40%; and 50% of Aitkin’s total population is potentially eligible.

Section (c)(1) above provides a list of strategies that DEED will work collaboratively with its national and state providers to implement to increase employment opportunities in these counties.

TABLE 8: SCSEP-ELIGIBLE MINNESOTA COUNTIES WITH HIGH UNEMPLOYMENT RATES

MN County	Unemployment Rate	Ratio of Eligible Individuals (55 years +)
Aitkin	3.70%	52%
Clearwater	3.60%	35%
Cottonwood	4.80%	36%
Hubbard	3.50%	42%
Itasca	3.40%	40%
Koochiching	3.90%	44%
Lake	3.40%	44%
Mahnomen	3.50%	30%
Mille Lacs	3.50%	33%
Pine	3.40%	38%
Wadena	3.40%	34%
Waseca	3.40%	31%

C. ARE MINORITIES

The relative distribution of PY22 Minnesota SCSEP participants who are minorities is provided in Table 9 below.

TABLE 9: MINNESOTA SCSEP PARTICIPANTS' MINORITY BY ETHNICITY/RACE (PY2022 GPMS DEMOGRAPHIC)

	State DEED		Center (CWI)		NICOA (S)		All Mn	
GROUP	YTD No.	YTD %.	YTD No.	YTD %.	YTD No.	YTD %.	YTD No.	YTD %.
Hispanic/Latino	3	2%	7	1%	1	8%	11	1%
American Indian or Alaskan Native	6	3%	9	2%	9	69%	24	3%
Asian	1	1%	8	1%	0	0%	9	1%
Black or African American	27	15%	306	56%	4	31%	337	46%
Native Hawaiian or Other Pacific Islander	0	0%	0	0%	0	0%	0	0%
White	136	76%	206	38%	0	0%	342	46%
More Than One Race	4	2%	3	1%	0	0%	7	1%

To provide context, the breakdown of Minnesota’s 55 and older population by minority group is provided in Table 10.

TABLE 10: MINNESOTA’S 55 AND OLDER POPULATION BY MINORITY GROUP

	White alone Not Hispanic	Black or African American alone Not Hispanic	AsianNative Hawaiian and Other Pacific Islander alone Not Hispanic	American Indian and Alaska Native alone Not Hispanic	Two or More Races	Hispanic or Latino (of any race)
55 to 64 years	34.65%	2.94%	2.23%	0.36%	1.87%	2.54%
65 to 74 years	25.24%	2.14%	1.62%	0.26%	1.36%	1.85%
75 Plus	17.81%	1.51%	1.15%	0.18%	0.96%	1.31%
Overall 55+	77.70%	6.60%	5.00%	0.80%	4.20%	5.70%

Source: U.S. Census Bureau, 2023 American Community Survey 5-Year Estimates.

D. ARE LIMITED ENGLISH PROFICIENT

The breakdown of Minnesota’s population who are LEP is provided in Table 11. The English proficiency is defined as those who either speak only English or speak “very well”. Any proficiency below “very well” is considered “limited”.

TABLE 11: MINNESOTA’S 55 AND OLDER POPULATION BY LEP STATUS

English Proficiency	Population 55+ Years	Percentage
Speak English only	1,525,985	87.8%

English Proficiency	Population 55+ Years	Percentage
Speak English "very well" and another Language	128,613	7.4%
Speak English less than "very well"	83,425	4.8%

Source: U.S. Census Bureau, 2022 American Community Survey 1-Year Estimates

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

See Table 12 for the relative distribution of PY22 MN SCSEP participants who have the greatest social need.

The term "greatest social need" is defined by the OAA to mean the need caused by noneconomic factors, which include— (A) Physical and mental disabilities; (B) Language barriers; (C) Cultural, social, or geographical isolation, including isolation caused by racial or ethnic status, that— (i) restricts the ability of an individual to perform normal daily tasks; or (ii) threatens the capacity of the individual to live independently.

**TABLE 12: RELATIVE DISTRIBUTION MN SCSEP PARTICIPANTS WITH THE GREATEST SOCIAL NEED
(PY2022 GPMS DEMOGRAPHIC)**

	MN DEED		Center (CWI)		NICOA		All MN	
GROUP	YTD	Pct	YTD	Pct	YTD	Pct	YTD	Pct
Severe Disability	6	3%	8	1%	0	0%	14	2%
Age 75 and Over at Date of Report	29	16%	86	15%	5	38%	115	15%
Old Enough but Not Receiving SS Title II	4	2%	7	1%	0	0%	11	1%
Rural	74	42%	87	16%	0	0%	161	21%
Frail	6	3%	7	1%	0	0%	13	2%
Homeless or At Risk of Homelessness	64	36%	257	46%	5	38%	321	43%
Failed to Find Employment After Using WIOA Title I	17	10%	61	11%	0	0%	78	10%
Disabilities	46	26%	129	23%	1	8%	175	23%
Limited English Proficiency	22	12%	190	34%	4	31%	212	28%
Low Employment Prospects	141	79%	456	81%	12	92%	597	79%
Low Literacy Skills	20	11%	104	19%	3	23%	124	16%
Severely Limited Employment Prospects in Areas	9	5%	13	2%	0	0%	22	3%

	MN DEED		Center (CWI)		NICOA		All MN	
of Persistent Unemployment								
Formerly Incarcerated	1	1%	1	0%	0	0%	2	0%
Veterans (or Eligible Spouse of Veteran)	19	11%	39	7%	0	0%	58	8%
Post 9/11 Era Veterans	2	1%	0	0%	0	0%	2	0%
Receiving Public Assistance	119	67%	432	77%	12	92%	551	73%
Family Income at or below Poverty	109	61%	432	77%	10	77%	541	72%
Displaced Homemakers	4	2%	33	6%	1	8%	37	5%
Active Participants	178		561		13		752	

F. FORMERLY INCARCERATED INDIVIDUALS, AS DEFINED IN TEGL 17-20

OUTREACH TO FORMERLY INCARCERATED INDIVIDUALS

MN DEED will implement the following strategies to ensure effective outreach to formerly incarcerated individuals:

- Develop partnerships with correctional facilities, transition coalitions, Recovery Corps and organizations supporting justice involved individuals.
- Attend and share information at Transition Fairs across the state.
- Utilize Federal Bonding Program grant and ensure employers and providers are aware.

In June 2022, DEED received funding from the Minnesota Job Skills Partnership Board (MJSP) for a pilot program called the "Re-entry Grant." This initiative aims to assist justice-involved individuals who have either not worked for 15 weeks or longer in the past year, are within six months of release, or have been released in the last six months from various correctional facilities in Minnesota. The program offers services including career planning and counseling, job search and placement assistance, and training and support services.

DEED collaborates with thirteen providers, two of which, Anoka County Job Training Center and Rural Minnesota CEP, also serve as SCSEP providers. DEED will continue to leverage the networks established by Re-entry program providers to reach out to justice-involved individuals. All SCSEP providers are encouraged to build relationships with Re-entry Grant providers to benefit from outreach and co-enrollment opportunities.

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))

The national grants competition and performance standards create possibilities for authorized positions/slots to be redistributed. If slots are redistributed, every effort will be made to ensure a seamless transition to the new SCSEP provider. The transition of enrolled participants to unsubsidized employment will occur before their slot is moved to the new location, or participants will continue to work with their current SCSEP program until they're exited. As described in a previous section, slots will be reduced and recruitment activities will end in overenrolled areas, and increased in under-enrolled areas, which should also help mitigate disruption to individuals.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

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.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	71.3%		71.3%	
Employment (Fourth Quarter After Exit)	67.7%		67.7%	
Median Earnings (Second Quarter After Exit)	\$7,882.00		\$7,882.00	
Credential Attainment Rate	70.0%		70.0%	
Measurable Skill Gains	61.0%		61.0%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

	Title I – Youth Program			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
<u>Employment (Second Quarter after Exit) ¹</u>	<u>70%</u>		<u>70%</u>	
<u>Employment (Fourth Quarter after Exit) ²</u>	<u>70%</u>		<u>70%</u>	
<u>Median Earnings (Second Quarter after Exit)</u>	<u>\$5,500</u>		<u>\$5,500</u>	

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<u>Credential Attainment Rate</u>	<u>57%</u>		<u>57%</u>	
<u>Measurable Skill Gains</u>	<u>58%</u>		<u>58%</u>	

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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);

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- 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	77.7%		77.7%	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Fourth Quarter After Exit)	76.8%		76.8%	
Median Earnings (Second Quarter After Exit)	\$12,309.00		\$12,309.00	
Credential Attainment Rate	74.3%		74.3%	
Measurable Skill Gains	66.9%		66.9%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	70.0%		71.0%	
Employment (Fourth Quarter After Exit)	70.0%		71.0%	
Median Earnings (Second Quarter After Exit)	\$4,000.0		\$4,000.0	
Credential Attainment Rate	62.0%		62.0%	
Measurable Skill Gains	44.0%		45.0%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

WAGNER-PEYSER ACT - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	60.0%		61.0%	
Employment (Fourth Quarter After Exit)	65.0%		66.0%	
Median Earnings (Second Quarter After Exit)	\$8,100.0		\$8,200.0	
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

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	35.0%	36.8%	35.3%	37.0%
Employment (Fourth Quarter After Exit)	36.0%	39.1%	36.3%	39.2%
Median Earnings (Second Quarter After Exit)	6,200.0	\$7,602	6,250.0	\$7,603
Credential Attainment Rate	20.0%	20.0%	20.3%	20.3%
Measurable Skill Gains	29.0%	36.7%	29.5%	36.8%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	57.7	58.0	57.7	58.5
Employment (Fourth Quarter After Exit)	55.6	57.9	55.6	58.0
Median Earnings (Second Quarter After Exit)	3,850.00	3,850.00	3,850.00	4,042.00

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Credential Attainment Rate	44.0%	44.5	44.0%	45.0
Measurable Skill Gains	48.0%	50.7	48.0%	51.2
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

VOCATIONAL REHABILITATION PROGRAM (BLIND) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	57.7%	58.0%	57.7%	58.5%
Employment (Fourth Quarter After Exit)	55.6%	57.9%	55.6%	58.0%
Median Earnings (Second Quarter After Exit)	\$3,850	\$3,850	\$3,850	\$4,042
Credential Attainment Rate	44.0%	44.5%	44.0%	45.0%
Measurable Skill Gains	48.0%	50.7%	48.0%	51.2%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADDITIONAL INDICATORS OF PERFORMANCE

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.

OTHER APPENDICES

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

The State Plan must include	Include
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes

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

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