

STATE OF IDAHO
Two-Year Strategic Plan (PY 2005-07)
Modification No. 1

The Strategic Two-Year Workforce Investment Plan for Title I of the Workforce Investment Act of 1998 and the Wagner Peyser Act is being modified. The following addresses those areas of the plan proposed for modification. These modifications are subject to change based on public comments. Persons wishing to comment on these modifications may submit written comments to Cheryl.Brush@cl.idaho.gov or to Cheryl Brush, Workforce Policy Advisor, Office of Workforce Policy, Idaho Commerce & Labor, 317 West Main, Boise, Idaho 83735. Comments received by the Department, no later than June 30, 2006, will be considered as part of plan development.

Modifications Throughout the Plan

The Workforce Development Council (WDC) adopted existing WIA local plans for Program Year 2005 to facilitate the transition to a single, statewide planning structure. Effective July 1, 2006, the regional WIA plans, which give service providers guidance on WIA program implementation, will no longer be in effect. References to “local” plans, definitions or processes have been eliminated: **Any changes or additions have been highlighted in yellow**, old text is in a ~~strike-through~~ font. These changes occur in sections V through X of the plan. Changes in the plan occur on the following pages:

Section V: Pages 62-63

Section VI: Pages 68, 69, 70-71 and 73-76

Section VII: Page 77

Section VIII: Pages 83 and 98

Section IX: Pages 126 and 135

Section X: Pages 142 and 143-144

The state plan will provide direction to service providers throughout the state. All existing adult, dislocated worker and youth service providers will be extended, with funds awarded on a proportionate basis, adjusted for underutilization of funds in PY 2005. The state will maintain the list of eligible providers of training services on its website. Revised attachments follow the plan modification. The new document is presented first, followed by the original that it is replacing.

WIA Flexibility Provisions—Waivers

This modification incorporates a waiver request to replace the current 17 WIA employment and training measures with USDOL’s six common measures. Section V.J., pages 62-63, has been modified to include a new section V.J.3., while Section X.C., pages 143-144, has also been amended to incorporate this change. Attachment 11-06 includes the approved negotiated levels for Idaho’s Workforce Performance Measures for PY06, which includes USDOL’s common measures.

Major State Policies

The Workforce Development Council reviewed existing service policies for implementation in Program Year 2006 and developed statewide policy direction for use by all WIA service providers.

Section VI, **Major State Policies**, Part F, pages 73-76, has been modified to include the new policies governing the statewide system.

Attachment #6-06 – Addendum – Revised Policy Framework

The Workforce Development Council reviewed and adopted a revised policy framework for the state's One Stop system for implementation in the Statewide Regional Planning Area. The Council named the Idaho Commerce and Labor as the One Stop Operator and designated its twenty-four (24) service centers as One Stop offices. As stated in the original plan, Commerce & Labor will offer its full range of partner program services (ES/Wagner-Peyser, Unemployment Insurance and WIA) through the center and will expand access to economic and community development services in each center. Partners will be required to make services available in only one center in each region in recognition of funding limitations; however, each One Stop Center will continue to make and accept referrals from partner organizations. See Attachment 6-06, which was approved by the Workforce Development Council on May 4, 2006.

Attachment #11-06 – Proposed Performance Measures for PY 06

Because of the transition from the 17 WIA performance measures to the six USDOL common measures, performance levels for the state need to be revised to coincide with the new measures. This attachment shows Idaho's proposed levels of performance for the coming program year under common measures.

Attachment #16-06 – State 15% Funds

The Workforce Development Council adopted changes in the administration of the state's 15% funds, including reductions in the amount of set aside for collecting customer satisfaction information and establishing an option for a limited "reserve." Attachment 16-06 to the plan has been modified to incorporate these changes.

Plan Modification Process (updated July 2006)

This plan modification was approved by the state Workforce Development Council on May 4th, 2006 and was published by posting on Idaho Commerce & Labor's website on May 31st. Legal notice was published statewide soliciting public comment on the proposed changes, as indicated at the beginning of this document. Although public comments on this plan modification were accepted until July 5th, none were received.

V. Overarching State Strategies

- A. *Identify how the State will use WIA Title I funds to leverage other Federal, State, local, and private resources in order to maximize the effectiveness of such resources and to expand the participation of business, employees, and individuals in the Statewide workforce investment system? (§112(b)(10).)*

Idaho has established a culture that supports leveraging of funds among multiple organizations to achieve common goals. WIA is a key partner in these efforts.

Implement Policy Academy Strategies

Idaho's WIA funds are decreasing while businesses and job seekers demand improved services. The Workforce Development Council will move quickly to implement the 21st Century Policy Academy recommendations and action plans to increase collaboration and leveraging of funds. Policy Academy strategies demanding collaboration with partners and business to maximize the impact of resources include:

- Improving labor market supply-demand information through partnerships with state and education agencies and worker and business intermediaries
- Enhancing the One Stop system and promoting collaborative efforts to expand access to the full array of services
- Developing and implementing the career cluster project to align education, workforce development and economic development planning and services
- Creating a governance and policy framework that aligns services across multiple agencies and programs
- Developing innovative approaches to creating awareness of Idaho's investments in workforce development including expansion of the workforce system's connection to business and education

Broaden One Stop Access in Idaho's Communities

Governor Kempthorne plans to improve the One Stop infrastructure, expanding from six to twenty-four One Stop Centers that are well located, modern, and professional ("business quality") in appearance. Over the past ten years, each of these One Stop sites was either remodeled or built new. Modern lobbies provide access to all the resources available through the IdahoWorks electronic network. Each One Stop also has a Resource Center with interview facilities and computer/copier/fax services available for employers' use. The Governor has brought a multitude of funding sources together to achieve infrastructure upgrading, including access to the state's Permanent Building Fund, which historically had never been made available to the workforce system because of its almost exclusive federal funding.

Strengthen the e³ Connection

The creation of the Department of Commerce and Labor strengthens the workforce and economic development connection through the combination of federal, state and local investments in workforce and economic development. This tie allows for a comprehensive package of services offered to businesses as they relocate or expand. Staff coordinate with state and local education, workforce and economic development providers to ensure that needs are met.

Efforts to improve labor market information are also a joint effort which enjoys the contributions of multiple organizations. The effort to organize workforce, economic development and education efforts around career clusters is yet another example of how the state leverages funding to meet the multiple needs of our citizens. In the health care area, workforce information staff will work with the newly established Nursing Workforce Center to produce better supply-demand information for nursing and other health care occupations. The state maintains a joint website with the Idaho Hospital Association,

Idaho Nurses Association and other health care providers to allow employers to list their jobs and recruit both within the state and on a national basis.

During PY'05 WIA funds will continue to support the customized/incumbent worker training projects that were developed in PY 2004. As funding permits, additional projects will be considered. Each of these projects required employer match of 50% with education entities contributing significant match as well. Existing public-private Business Industry Consortia will be continued and linked to the career cluster project led by the professional-technical system.

Advance the Technology of the Workforce System

The One Stop system has, and will continue to invest heavily in, using technology to expand the services provided to its customers as well as the tools available to workforce staff to improve their effectiveness and efficiency. As with improvement of facilities, much of the progress in technology was made possible by creatively using a variety of grant funds and supplemental funding sources to achieve the desired results.

Modern electronic lobbies now provide access to all the resources available through the IdahoWorks electronic network in One Stop Centers across the state, with the help of the Federal One-Stop grant and the state's Special Administration Fund. Upgrading/replacing all the lobby computers was completed using a portion of the Reed Act funds that were distributed back to all states by the U.S. Department of Labor.

The most significant technology development for the state's workforce system has been the IdahoWorks information system. This is a comprehensive system used to deliver a variety of unemployment insurance (UI), labor exchange, WIA financial and case management systems on a statewide level. IdahoWorks is constructed using internet technologies thus allowing establishment of secure access internally in the workforce system and externally by customers over the internet.

Labor market information is another customer service that has helped business benefit significantly from a commitment to technology. Idaho's newly designed Labor Market Information (iLMI) website helps businesses make decisions with a wide variety of data including availability of skilled workers, pay and benefits by occupations, economic profile of the state and counties, area demographics, industry growth and composition, and number of workers by occupation. During PY 2003, the iLMI website experienced over 117,525 visits comprising well over 1,184,826 hits. Customer and partner interest in iLMI is continuing to grow as the Council and workforce staff are notified of continuous website updates in response to new customer feedback processes.

B. What strategies are in place to address the national strategic direction discussed in Part I of this guidance, the Governor's priorities, and the workforce development issues identified through the analysis of the State's economy and labor market? (§§112(b)(4)(D) and 112(a).)

The Governor's priorities as outlined in Section II incorporate strategies to achieve the state and federal priorities and are supported by labor market data. Among the priorities are:

1. Expanding training opportunities by achieving savings in overhead costs through the shift to a single statewide system;
2. Expanding access to training and services by expanding from six to twenty-four one stop centers;
3. Supporting high school standards to ensure that students leave school prepared for further learning; high school reform initiatives designed to increase the number of students moving on to postsecondary education; expanding access to postsecondary

education through creation of a system of community colleges and adopting accountability standards in the postsecondary system;

4. Strengthening efforts to create a demand-driven system through the availability and use of quality workforce information, integration of economic development and workforce development services throughout the expanded one stop system, and stronger ties between the business community and the education system;
5. Strengthening the e³ connection through common use of the career cluster system for economic development, workforce and education, and the adoption of a system of common or system measures;
6. Maximizing the investment of workforce dollars through the identification of all available workforce services and implementation of a strategic planning process based on that data and workforce information;
7. Strengthening partnerships among youth service providers to ensure services to the state's neediest youth;
8. Ensuring access to system services by business and individual consumers, including those in faith-based and other organizations by more broadly communicating the availability of system services;
9. Promoting workplace flexibility and a system of life-long learning to maintain a quality workforce while recognizing the importance of balancing family and work; and
10. Supporting development of an entrepreneurial workforce.

C. *Based on the State's economic and labor market analysis, what strategies has the State implemented or plans to implement to identify and target industries and occupations within the State that are high growth, high demand, and vital to the State's economy? (§§112(a) and 112(b)(4)(A).) The State may want to consider:*

1. *Industries projected to add a substantial number of new jobs to the economy; or*
2. *Industries that have a significant impact on the overall economy; or*
3. *Industries that impact the growth of other industries; or*
4. *Industries that are being transformed by technology and innovation that require new skill sets for workers; or*
5. *Industries that are new and emerging and are expected to grow.*

Demand-driven Strategies

As the workforce system responds to the Governor's economic development goals for the science and technology and health care industries, the demand for a seamless pipeline between all levels of education and workforce is a driving priority.

With their participation in and full adoption of the Policy Academy goals, the Workforce Development Council and Board of Education have committed to implementation of innovative strategies to meet high growth business demand for a trained workforce:

1. convert business data to useful information for curriculum development
2. create an integrated system of professional-technical and community colleges to respond to regional demands
3. ensure seamless transition among all levels of education for transferability of credits
4. further connect workforce, economic and education systems and develop measures to test system effectiveness and responsiveness to the business community.

For the last two years, the Workforce Development Council has targeted a portion of WIA State 15% funds to support projects focused specifically on development of business, education and workforce partnerships to meet business identified needs. If WIA State 15% funds are available in PY06 to support optional activities, the Council will seek proposals replicating these projects where business identified specific training needs and supported solutions with education partners.

The State is also embarking on a project identified in the policy academy process to organize education, employment and economic development services into career clusters. These and other critical activities have been chronicled in a monograph that is soon to be published. The monograph documents the extensive training for staff of one stop partner agencies, models that support the view of business as the primary customer and the comprehensive integration of employment, education and economic development services.

Science and Technology

One out of every ten Idaho workers was employed in science and technology industries in 2002. The growth in Idaho's number of science and technology establishments has well outpaced the national trend. Science and technology establishments grew in Idaho at an impressive rate of 15.3 percent. Nationally, establishments only grew by 4.5 percent. This well above average growth indicates a science and technology sector in Idaho that possesses the potential to become a major employment growth engine for the state's overall economy.

According to a report issued by the Governor's Science and Technology Council, there is perhaps no more critical issue for technology companies than their need for well-educated, technical workers. The Council also reported that Idaho is not producing a sufficient supply of engineers and other technology workers to meet local industry needs. The workforce system will continue to focus on science and technology as a critical industry with higher than average wages. Eastern Idaho is home to one of seven national laboratories, offering a unique opportunity to partner in growing a technology workforce.

Health Care

Across the nation and in Idaho, workforce systems are facing a severe shortage of health care technicians and nursing staff in particular. In its "White Paper", the Idaho Commission on Nursing and Nursing Education (ICNNE) says:

Idaho's nursing workforce mirrors many of the national issues with some important differences but an equally uncertain future. The number of RNs licensed in Idaho has remained steady over the past 3 to 4 years. Aging RNs and nursing faculty reflect closely the national patterns. Idaho has been fortunate to have an increased interest in nursing education; however, limited expansion in nursing education slots has kept Idaho from capitalizing on this interest in entering the field. Idaho will continue to focus on improved labor market information through work with the new Work Center, expansion of training opportunities and public-private partnerships to identify and respond to training and hiring needs.

- D. What strategies are in place to promote and develop ongoing and sustained strategic partnerships that include business and industry, economic development, the public workforce system, and education partners (K-12, community colleges, and others) for the purpose of continuously identifying workforce challenges and developing solutions to targeted industries' workforce challenges? (§112(b)(8).)*

Benefiting from a relatively small population, the state has a well-coordinated e³ system with extensive organizational relationships. Key leaders across the system are generally aware of others' programs and services and have established relationships among state and local partners. State and local workforce organizations have collegial relationships, and willingly work on joint projects. Most are familiar with services of sister organizations and have long standing collaborative relationships. State and local agencies have initiated many processes to engage business with education and workforce and to market their services to the business community, with modest success. Several new projects

have been initiated under the auspices of the Academy to increase access and awareness.

As discussed elsewhere in this plan, there are a number of initiatives designed to promote collaborative efforts to address workforce challenges for targeted industries. In the Policy Academy process, the state identified health care and science and technology as two sectors requiring additional attention. The Workforce Development Council is also focusing on the construction industry. The Council will regularly oversee this process and will seek continued improvements in labor market information, establishment of career clusters, support for business industry consortia and projects targeted at these industries. Creating a quality workforce is also a primary objective of Governor Kempthorne's Science and Technology Council who have identified solutions for attracting and retaining workers in this sector.

- E. *What State strategies are in place to ensure that sufficient system resources are being spent to support training of individuals in high growth/high demand industries? (§§112(b)(17)(A)(i) and 112(b)(4)(A).)*

Governor Kempthorne, the Workforce Development Council and workforce system partners are realigning systems to ensure their resources are directed at the needs of high growth and high demand industries as seen in the Policy Academy action plans referenced throughout this document. Additional State strategies are outlined below.

Workforce Investment Act

With the planned consolidation of the six regional areas into a new single statewide regional planning area structure, the state will reduce administrative overhead from 14 percent to less than 3 percent, a reduction of more than \$1.3 million now spent to support the six-region structure. This efficiency maximizes the available money directed to training and services to business and job seekers in the face of the severe federal budget cuts experienced by the state in the last four years. Idaho has set a goal of spending 50% of WIA Title IB local adult and dislocated worker funds for direct training and support of businesses and participants.

If optional State 15% funds are not directed to support required dislocated worker services due to a reduction in federal dislocated worker and rapid response funds, the Workforce Development Council will consider release of PY05 and PY06 funds to support high growth projects offering partnerships of business, education and workforce systems as it has the past two years. High growth projects underway are expected to continue into PY'05. The Business Industry Consortia are also expected to be retained. Partnerships will be sought, particularly in connection with the career cluster project, to support these consortia in other targeted industries.

While the state will honor individual choice in the ITA process, we will also routinely monitor the use of ITAs in selected occupations to determine whether additional efforts should be directed to critical areas experiencing worker shortages.

Workforce Development Training Fund

Policies for the WDTF will be reviewed during PY'05 to ensure funds are directed to those industries with the highest impact for individuals and the communities. This focuses limited resources on those critical jobs that will contribute to the self-sufficiency of our workers as they fuel the growth in the local economy.

Improved Information Related to High Demand Occupations

One of the state's Policy Academy strategies for enhancing the workforce development system is defining a set of career clusters and other tools for use in career exploration, workforce development, education, and economic development in the state. Already, 16

clusters have been identified with pathways defined under each cluster. With approval of this effort at the September 2004 Council meeting, Professional-Technical Education is providing leadership to continue defining clusters and outlining the skills for each pathway created under each cluster.

Idaho Commerce and Labor recently unveiled an addition to their website to assist employers and job seekers with access to and use of labor market information. The new iLMI, Idaho's Labor Market Information system, uses traditional labor market information to support online tools that build and retain personalized business development and career exploration information on a local, regional or statewide basis.

- F. *What workforce strategies does the State have to support the creation, sustainability, and growth of small businesses and support for the workforce needs of small businesses as part of the State's economic strategy? (§§112(b)(4)(A) and 112(b)(17)(A)(i).)*

Idaho is one of the best places in the nation for entrepreneurial activity, and ranks first in the nation for patents issued per capita, according to the 2004 CFED Report Card for the States. The Center for Enterprise Development gave Idaho an "A" for its Entrepreneurial Energy. Idaho ranked first in the nation for manufacturing investment, third in change in new companies, and 14th in technology industry employment. The state also ranked 3rd in energy costs, 5th in long-term employment growth and net migration, 8th in homeownership rate, and 10th in households with computers. A variety of strategies continue to support the creation, sustainability and growth of small businesses and support their workforce needs in Idaho.

Core Business Services

The Workforce Development Council has overseen development of Idaho's One-Stop centers to ensure provision of core services critical to new and small businesses by offering the latest technology, full office support services, and space for recruitment needs. Core business service includes electronic job listing, recruitment and referral services, customized labor market information, economic development support available in Idaho, and a business resource center that has interviewing facilities that include computer, fax, copier, and video equipment. Workshops and forums on a variety of special interest topics for business are also provided.

Workforce Development Training Fund

For small companies looking to expand or relocate in Idaho, the Workforce Development Training Fund supports training of new employees to improve the company's ability to take advantage of larger market and economic opportunities. The rural component streamlines the application process for small entrepreneurial businesses in rural counties with high unemployment or low per capita income. These businesses are eligible for up to \$3,000 for each new position created.

Idaho Business Network (IBN)

Idaho's Business Network provides business support our smaller companies need to compete with larger corporations, matching the purchasing needs of federal and state agencies with the products and services of Idaho companies. In addition, IBN provides technical assistance with completing bid documents, offers seminars on evolving procurement practices, and hosts the Governor's Business Opportunity Conference, putting business face-to-face with purchasing professionals of government agencies and large corporations. Annually, Idaho businesses average over \$100 million in federal and state contracts by taking advantage of IBN services.

TechConnect

TechConnect acts as project managers to access the resources necessary for businesses to commercialize private, university, and governmental technologies. Three

TechConnect offices throughout Idaho work to strengthen early-stage science and technology companies. The program combines education, networking, venture capital and collaboration between government and business to accomplish its goals. One of the plan's more innovative features is the use of university students to support entrepreneurial development through a program called TEAMS.

Workforce Training Network (WTN)

Idaho's higher education entities have partnered to create the Workforce Training Network, to respond rapidly to employer needs for customized training. Outreach directly to employers and through partnering with other workforce system entities is underway. Small business has voiced appreciation for the WTN's quick response, flexibility, custom tailoring of training for new or incumbent workers and delivery of training in an approach designed by the business.

Rural Economic Development Professional Program

Governor Kempthorne is providing a third year of funding for 12 areas of the state to continue the **Rural Idaho Economic Development Professionals** program, bringing support to areas where a majority of Idaho's small businesses are born. The \$500,000 program allows counties or groups of counties to hire local economic development professionals. Each area will use \$41,500 to pay a competitive salary and benefit package. Local match is provided in office space, supplies and travel expenses.

Governor Kempthorne's **Rural Idaho Initiative** provides nearly \$3 million to cities and counties for job creation and business expansion projects in rural areas. Rural Idaho communities have used funds to create more than 650 jobs since the program's inception in 2001.

Small Business Development Centers

Idaho's SBDCs offer the latest in business counseling and technical assistance in all aspects of small business management, with a primary goal of helping small business owners and potential business owners make sound decisions for the successful operation of their business.

Idaho's Small Business Innovation Research (SBIR)

The Idaho SBIR Initiative's goal is to work with the Idaho TechConnect offices, the **Small Business Development Centers** (SBDCs), the **Idaho National Laboratory**, and the state's universities to help Idaho companies apply for and receive between \$10 million - \$15 million in SBIR and STTR awards by 2009. The Initiative's objectives will be achieved by educating small businesses about the program, teaching businesses how to write a successful proposal, providing a supportive statewide infrastructure of resources to assist small businesses and partnering small businesses with other successful awardees and research institutions. The potential for Idaho businesses is great, and while the goal is aggressive, it is achievable.

Business Response Team

Idaho Commerce and Labor offices in two areas of the state are currently piloting the Business Response Team (BRT) project, adapting innovative business outreach activities developed in the state of Maine. The goals of the project are to help new businesses survive, thrive and expand, and to develop and enhance the relationship between Idaho Commerce and Labor and the business community. The strategy for achieving the goals involves assessing the needs of an individual company, providing consultation and brokering services, and following up with ongoing support. Successful strategies will be replicated across Idaho in PY05 and PY06.

Export Assistance

The International Trade Division offers export counseling, seminars, and marketing resources to Idaho companies. Additionally, marketing opportunities via catalogs, trade shows, and trade missions are provided at a nominal fee. Idaho trade representatives in Mexico, China, Taiwan, and Korea assist companies by finding business opportunities, distributors, and projects. Partnership with the U.S. Commercial Service provides worldwide resources and assistance.

Tech-Help

TechHelp is an organization uniquely positioned to assist Idaho manufacturers become more competitive. Lean manufacturing, human performance, quality systems, product development, and information technology are all areas in which TechHelp assists Idaho companies.

Marketing/Education

As part of Idaho's commitment to foster a thriving economy and a strong business climate, Idaho Commerce & Labor published a booklet entitled "Starting a Business in Idaho". This booklet, available in English and Spanish, provides Idaho entrepreneurs and new businesses with information essential to begin successful operations. It highlights the registration process and the regulatory issues new businesses encounter and includes a directory of organizations specializing in business start-up assistance.

- G. *How are the funds reserved for Statewide activities used to incent the entities that make up the State's workforce system at the State and local levels to achieve the Governor's vision and address the national strategic direction identified in Part I of this guidance? (§112(a).)*

State Workforce funds are primarily used to provide an infrastructure that supports local service delivery to allow for the maximum direction of funds allocated to the local level to services. Funds have been set aside to support youth in need activities in areas with high concentrations of at risk youth and special industry-education-workforce projects to promote additional training in high growth, high wage industries and to maximize efficiencies in the system. Funds are also used to support development of labor market information, particularly improved supply-demand information and to expand the reach of the Local Labor Economists to assist workers and local businesses. Statewide funds are also directed to increase efficiencies in the management information and financial management system and to incent collaboration in the Idaho Workforce Consortium.

- H. *Describe the State's strategies to promote collaboration between the public workforce system, education, human services, juvenile justice, and others to better serve youth that are most in need and with significant barriers to employment, and to successfully connect them to education and training opportunities that lead to successful employment. (§112(b)(18)(A).)*

As indicated earlier in the plan, youth programs operated under the WIA have been integrated with Governor Kempthorne's Generation of the Child initiative. Through this, the workforce system will participate as part of a highly coordinated, continuum of services designed to assure that healthy, well-nurtured, and well-educated youth enter adulthood as productive members of the workforce.

Among the youth services available on a statewide basis are the employment and training services offered under the Workforce Investment Act, labor exchange services offered through Wagner-Peyser, services for youth who have entered the juvenile justice system through the Department of Juvenile Corrections and county probation offices, services to youth in families receiving, at-risk of needing, or transitioning from public assistance and/or foster care services through the Idaho Department of Health and Welfare, vocational training opportunities at the secondary and postsecondary level

provided through the public school system and postsecondary technical colleges, services to youth with disabilities through the Idaho Division of Vocational Rehabilitation, and elementary and secondary educational services offered through the Department of Education and local secondary school districts. In addition, the Idaho Migrant Council offers employment and training services to migrant and seasonal farmworker youth at various sites across the state. Local efforts also continue across the state to provide opportunities to youth as they transition from the world of learning to the world of earning. These statewide services are augmented by a network of local providers and community based organizations throughout the state, including five Native American grantees within the state that provide employment and training services to Native American youth.

A number of highly effective partnerships have been developed among the agencies listed above in the delivery of youth services on a statewide level and through local youth organizations. Representatives from most of these agencies and organizations serve on the Idaho Workforce Development Council.

Because WIA funds are limited, development of a comprehensive, community-wide approach to meeting the needs of youth will require collaboration among a variety of workforce, educational, and related agencies to develop program strategies that address the multiple needs of youth and establish the sequence of services needed to help youth move toward functioning as effective citizens, family members and employees.

- I. *Describe the State's strategies to identify State laws, regulations, policies that impede successful achievement of workforce development goals and strategies to change or modify them. (§112(b)(2).)*

Under the leadership of Governor Kempthorne, the state has made extensive efforts to reform its workforce development systems to meet business needs for a highly skilled workforce and provide its citizens an opportunity to meet their economic goals. The Governor believes that economic growth is directly linked to the availability of a pool of highly skilled workers who are prepared for the demands of the new economy.

The state has taken a number of steps to align its workforce development policies to create a demand-driven system within the state. First, the Governor assigned the Workforce Development Council the responsibility to coordinate the functions. The state conducted a survey of all workforce programs and identified governance and planning processes as part of the survey. The One Stop Policy Team will develop recommendations for improvement of strategic planning processes during the coming year. Effective July 1, 2004, Governor Kempthorne merged the Departments of Commerce and Labor. This has provided an opportunity for better alignment of policy planning between economic development and workforce development. The State Legislature also approved the Governor's initiative to create the Office of Science and Technology within the new Department. At the same time, Governor Kempthorne introduced and the legislature passed a number of tax incentives to help Idaho create high skill, high wage jobs and the communication infrastructure to support them.

A summit held in December, 2003 engaged key workforce, education and economic development stakeholders in a dialogue to identify needed services and improve communication. The State held a joint meeting of economic development and workforce development leaders earlier this year as an outgrowth of the merger and to refine goals for better integration of economic and workforce development services. The state also has a Workforce Training Network representing the Division of Professional-Technical Education, all of the technical colleges in the state and the Department of Commerce and Labor. This network can coordinate the delivery of targeted workforce training throughout the state.

As part of the process to identify and remove barriers at all levels in the workforce system, the state has implemented a continuous improvement process designed to ensure high quality services for Idaho's citizens and business customers. This involves working closely with local providers to identify potential problems early and to make the appropriate adjustments in performance expectations, reporting on their accomplishments, identifying areas targeted for improvement based on the analysis of performance, and reviewing plans for any process improvement initiatives undertaken as a result of this analysis. When concerns are noted or deficiencies occur, the local provider also is expected to identify the impact area(s) and specific measures that will be implemented to address the concern or deficiency.

Monitoring the WIA performance system and performance expectations ensures that local providers contribute to quality service delivery. Meeting and exceeding appropriate performance levels will require comprehensive quality services that will contribute to a high level of customer satisfaction, as will an emphasis on performance accountability.

J. Describe how the State will take advantage of the flexibility provisions in WIA for waivers and the option to obtain approval as a workflex State pursuant to Section 189 (8) and Section 192.

1. Extend the waiver of the Time Limit on Period of Initial Eligibility for Training Providers.
 - a. The State of Idaho respectfully requests an extension of an existing waiver regarding the Workforce Investment Act's (WIA) time limit on the period of initial eligibility of training providers (20 CFR 663.530), through June 30, 2007, the end of the planning cycle for this plan being submitted.
 - 1) Idaho's original request was to waive the subsequent eligibility provisions as outlined in Section 122 (c) and (d) of the WIA legislation. Although the U.S. Department of Labor did not provide a waiver for the state's specific request, it did waive the time limit on the period of initial eligibility that was extended through June 30, 2004. An additional request for waiver of this provision was granted and extended the period of initial eligibility through June 30, 2005.
 - 2) The state's training providers have expressed strong concerns with the implementation of subsequent eligibility requirements. The concerns include the following:
 - (a) confidentiality (FERPA compliance),
 - (b) excessive administrative burden and costs associated with tracking all students,
 - (c) time delays with UI wage records,
 - (d) the difficulty in establishing statistically valid processes for adjusting UI wage record data based on economic, geographic, and demographic factors of the local area and characteristics of the population being served, and
 - (e) establishing a consumer report based on a wage record system that underreports employment rates for training programs.
 - b. With WIA reauthorization set to occur soon, this raises opportunities to streamline training providers' subsequent eligibility under a "new" WIA.
 - c. Idaho is committed to delivering quality employment and training programs under WIA. However, it is very likely that if the waiver is not extended, the implementation of the subsequent eligibility criteria will prevent providers from participating in WIA and deny the state the ability to continue to provide the broadest range of training options for its WIA participants.
2. Statewide Regional Planning Area—Single Statewide Council

- a. With this plan, the State of Idaho is formally seeking a waiver to apply 20 CFR 661.300(f) which permits a state board to carry-out the roles of a local board in a single local area to a statewide regional planning area. Idaho has experienced a 37 percent drop in funding – more than \$5.6 million – in the last four years. The allocation for the program year beginning in July was cut \$1.8 million. This bleak financial outlook makes change imperative. The shift from six regional areas to a single statewide planning area allows the Governor to address the Administration's strategic priorities and to further reforms envisioned in the Workforce Investment Act. No areas in Idaho qualify for mandatory designation; with the continuing loss of funds, maintenance of this system is no longer a viable option. The Governor has announced his desire to move toward a single state area and will do so through designation of two areas which will enter into a cooperative arrangement to function as a single state area. As described in section VIII.E.1, Governor Kempthorne will require development of a single regional plan for the state. To maximize resources available for service delivery, the state also wishes to use the Workforce Development Council as the local workforce board for this area. This will foster sharing of data and information across regions and ease movement of customers from region to region.
- b. No state or local policies would limit the Governor's authority to require a regional plan or utilize the Workforce Development Council as the local workforce board for the Idaho Workforce Consortium.
- c. The State will achieve the following goals if the waiver is granted:
 - 1) The new single statewide planning structure will reduce overhead from 14 percent to less than 3 percent, a reduction of more than \$1.3 million now spent to support the six-region structure. This efficiency maximizes the available money directed to training and services to business and job seekers in the face of the severe federal budget cuts experienced by the state in the last four years. The State has set a goal of spending 50% of WIA local Adult and Dislocated Worker funds for direct training and support of businesses and participants, positively impacting achievement of performance goals.
 - 2) The new statewide structure will enhance efforts to transform the system into a demand driven system by further integrating economic development activities into the one stop system. The 24 Commerce and Labor offices across the state will serve as the state's one stop centers and will incorporate the full range of economic and community development services in their offerings. The priority for 2005 will be to ensure that all 24 offices have the training and support to become full service business centers. This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.
 - 3) The One Stop system will be enhanced by expanding the number of IdahoWorks One Stop Centers from six to twenty-four, broadening the reach to Idaho's citizens and business customers in our urban and rural areas. As indicated above, the focus in year one will be on building the capacity of these centers to offer economic and community development services. During 2005, the Governor's Workforce Development Council will also negotiate new MOUs with One Stop Partner organizations with the goal of expanding their participation in the One Stop system in PY 06 to more fully integrate the wider range of services available at the centers.
 - 4) The statewide delivery structure also affords an opportunity for the Workforce Development Council, working in concert with the Governor's Coordinating Council for Families and Children, to redesign youth programs, taking fuller advantage of opportunities for leveraging funds

among organizations serving youth. During PY'2005, the State will, to the extent possible, honor the commitments made by the six local boards. At the same time, the Workforce Development Council will partner with the Governor's Coordinating Council for Families and Children in a strategic planning process designed to identify gaps and prioritize services to those youth who demonstrate the greatest need.

- 5) The new statewide structure will strengthen administrative oversight and accountability processes. Administrative deficiencies have resulted in substantial disallowed costs in Idaho's largest Workforce Investment Area. The new strengthened administrative structure will assist Idaho in avoiding future disallowed costs and thus will further enable the redirection of funds from service provider and administration to direct participant training and support.
- d. With the change to a statewide regional planning structure and this waiver, we expect to increase training opportunities for an additional 500 or more adults, dislocated workers and at-risk youth as we add services for the business community.
- e. The waiver was announced to the general public as part of the plan review process which included a process for soliciting review and comment during a three-week period and review by the Governor's Workforce Development Council. The Chairs of the Local Elected Official organizations and the Local Workforce Investment Boards and their executive staff received letters announcing this proposal. Each individual also received a personal call in advance of the letter to advise them of this change and offer an opportunity to comment on the proposal. The State maintains a sophisticated management information and oversight system that tracks progress of financial and participant goals. Progress will be reviewed on a quarterly basis to ensure that goals are achieved. The Workforce Development Council will advise the Governor on specific policy changes needed to achieve the priority areas identified above. Additional communication strategies will be devised to ensure that citizens throughout the state are informed of progress and provided an opportunity for input into the states workforce development system.

3. Utilize Common Measures for PY 2006

- a. Idaho is requesting a waiver to adopt and report on the six common measures in lieu of the existing 17 WIA performance measures for PY 2006 (beginning July 2006), coinciding with implementation of these measures for the state's Wagner-Peyser, Jobs for Veterans Act and Trade Adjustment Act programs.
- b. With the shift to the six standards under common measures, Idaho would achieve the following goals:
 - 1) Eliminate duplicative administrative systems which will reduce paperwork and labor costs associated with redundant data collection. One example includes:
 - Eliminate the tracking and performance for
 - i. the credential measure for Adults and Dislocated Worker clients
 - ii. the skill attainment measure for Younger Youth; and
 - iii. the current Customer Satisfaction measurement system required by the USDOL.
 - 2) Enhance integration of the One Stop System by use of a single measurement system to test performance.
 - 3) Refocus youth investments by creating opportunities to better implement the USDOL's Strategic Vision for Services to Youth, which includes a

youth program focused on out-of-school populations with increased accountability for employment and/or increased secondary and postsecondary education outcomes.

4) Cost savings through streamlining. A simplified and streamlined performance measurement system is more cost effective. With consistent direction, program resources can be directed to a single set of goals, rather than competing goals and costly processes.

c. The waiver request was approved by the Workforce Development Council in May and public comments are being solicited.

VI. Major State Policies

Describe major State policies and requirements that have been established to direct and support the development of a Statewide workforce investment system not described elsewhere in this Plan as outlined below. (§112(b)(2).)

- A. *What State policies and systems are in place to support common data collection and reporting processes, information management, integrated service delivery, and performance management? (§§111(d)(2) and 112(b)(8)(B).)*

The State of Idaho has invested heavily in automation and integration of information systems since the implementation of WIA. Continuous development of workforce system databases within a common Internet based platform brings increased accessibility and enhanced communication within the One Stop arena. The workforce system databases, collectively known as *IdahoWorks*, offer online learning and staff training, data sharing from self-registration, online job order listings, unemployment insurance initial claims and continued claims, Personal Reemployment Accounts (PRAs), as well as WIA participant and financial data. Inclusion of TAA is in development stages and will be completed during PY05. Further enhancements related to information exchange and addition of other programs within *IdahoWorks* will occur as the One Stop system matures and funds to support integration are available.

Idaho's Internet database platform provides statewide secure user access. A number of ad hoc management and case manager reporting options are in place, with further enhancements available ~ demographic/programmatic/accounting data related to active participants or completers; data collected during follow-up; required federal reports, including performance data based on quarterly wage records and supplemental information. Ad hoc reporting allows the user to access data at all levels ~ State, area, service provider, or participant. Customer satisfaction survey response data is also housed within the database system, and can be viewed in the aggregate using the reporting system.

As the Workforce Development Council finalizes common performance measures for Idaho's workforce system, and as refinements are made to provide USDOL's common reporting measures, *IdahoWorks* will be expanded and modified to incorporate any necessary data collection and integrated reporting.

Data quality is controlled at the point of input through a series of edits that demand accuracy in data entry. The system also produces data quality reports or "DQRs" that prompt staff of the need to review selected elements for accuracy or further updates. These are monitored by state staff to ensure that they are cleared. At entry, the state also requires data validation, as described elsewhere in this section. Staff select a sample of enrollment records at registration and are required to review a minimum sample of 10% of records and validation documentation to ensure accuracy. A second sample is obtained during the routine monitoring and validation is accomplished at this point as records are reviewed for quality. Finally, the federally required validation is performed on yet a third sample of records.

- B. *What State policies are in place that promote efficient use of administrative resources such as requiring more co-location and fewer affiliate sites in local One-Stop systems to eliminate duplicative facility and operational costs or to require a single administrative structure at the local level to support local boards and to be the fiscal agent for WIA funds to avoid duplicative administrative costs that could otherwise be used for service delivery and training? (§§111(d)(2) and 112(b)(8)(A).)*

The decision of Governor Kempthorne to move toward statewide regional planning, his designation of Idaho Commerce & Labor as the single administrative entity, grant recipient and fiscal agent, and the State's continued support of a single statewide MIS and financial system for WIA eliminate duplicative administrative costs in Idaho and promote efficient use of administrative resources within the workforce system. The One Stop system will be enhanced by expanding the number of IdahoWorks One Stop Centers are proposed to expand from six to twenty-four, greatly increasing workforce system reach to Idaho's citizens and business customers and increasing sites where co-location and integration are feasible. These centers will house workforce, economic development and community development services providing an opportunity to expand access and lower the relative cost of doing business for each program. Additional policies will be considered as the Workforce Council analyzes its inventory of workforce services.

C. *What State policies are in place to promote universal access and consistency of service Statewide?*

Development of the One Stop system has focused on designing the system to meet the needs of customers from various population groups, provide access to the system and allow for the delivery of comprehensive services.

System Features

In designing Idaho's One Stop system, the needs of a broad spectrum of employment and training customers were taken into account. These include the job-seeking population at-large and those with special needs--students, migrant/seasonal farmworkers, veterans, dislocated workers, older individuals, people with disabilities, welfare recipients, dropouts, people with limited English proficiency, economically disadvantaged individuals, as well as the employer community, both current and prospective. Through the active participation of partner agencies/programs and interest groups in system design, the concerns identified by these groups carried forward into program features.

Access

Idaho Works is an automated service delivery system, an interactive, customer-focused electronic environment through which customers can access services and information. *Idaho Works* is the cornerstone of the One Stop system because it provides the mechanism to unify workforce development efforts. To ensure that *Idaho Works* meets Idaho's needs, system access is available in a variety of locations and access modes. Each One Stop Career Center in the state has multiple workstations in its electronic lobbies. Each Center has at least one computer that is specifically designed to accommodate a variety of disabilities. Customers can come to the Center during office hours and access all Center programs and information sources. Staff are available to help individuals use *Idaho Works* and provide personalized intervention services at the customer's request.

Other entrance points into *Idaho Works* are available from the Affiliate Partner sites, and through the Internet and access is available 24 hours a day, seven days a week, to meet the needs of our customers.

Partner agencies are able to assist their clients in registering for work, screening available job openings, reviewing eligibility criteria for training or other services and obtaining labor market, customer satisfaction and performance data from their delivery locations.

Because Idaho is a rural state, providing services in remote locations has always posed many problems. Not limited to our remote customers, the Internet has allowed anyone worldwide to access *Idaho Works*.

Comprehensiveness of Services

Idaho's One Stop system will include all mandatory partners along with some voluntary agencies and organizations identified locally by the One Stop Operators. The minimum menu of core services required by the Act will be made available in the state's One Stop system and may be expanded locally for additional service elements as agreed upon by local partners.

WIA Title IB services will be available in all one stop centers. Wagner-Peyser funded labor exchange services will be coordinated with other One Stop system partners in the delivery of core services to avoid duplication of services. Wagner-Peyser service will be provided in all designated One Stop Centers as will Unemployment Insurance, Veterans employment and training programs and NAFTA/TAA.

The full array of core services is currently available through at least one full service One Stop Center in each of the six workforce areas, although the Governor's goal is to expand to all 24 Commerce and Labor offices during PY'05. One Stop services will also be provided through additional Affiliate sites and via the Internet.

One Stop Centers

State policy requires the participation of all mandatory One Stop partners listed at WIA §121(b)1 and encourages the voluntary participation of other employment and training entities within the local areas.

Each substate area is required to have at least one physical comprehensive One Stop Center with a goal of delivering comprehensive services in all twenty-four centers. All required partners must make their applicable core service available in at least one regional One Stop Center and provide access to their other activities and programs. Partners must use a portion of their funds to create, maintain and participate in the One Stop delivery system, and provide their core services.

One Stop Affiliates

One Stop Affiliates are partners in the One Stop system. Affiliate Partners will provide access to information and services, but will not be required to offer universal access. Instead, they may limit services to particular customer groups; e.g., the disabled, students, migrant/seasonal farmworkers, economically disadvantaged, etc. State policy requires Affiliate Partners to enter into an MOU describing their specific participation in the One Stop system; maintain access to the Idaho Works automated system; offer assisted services to those who prefer such services over automated services; and make accurate and up to date information on their services available for access through Idaho Works. They will also be full partners in the regional planning and continuous improvement management processes. With the shift to a statewide planning system, new MOUs will be developed with a goal of expanding the array and reach of all services. With the change to a statewide system, this responsibility will move to the Workforce Development Council and the Governor.

Direct Access Systems (Self Service Systems)

Self-service access will be available in a variety of locations and from classrooms, homes and offices across the state. Self service access points will provide access via the Internet *Idaho Works* which will provide information, registration for work, and services planned for the Internet, such as application for Idaho postsecondary schools and Financial Aid services.

Customer Choice

Customer choice will be achieved through the partnering of Idaho's workforce service providers at the state and local level, bringing information and services together in the One Stop system. All One Stop Centers will offer the full range of comprehensive services to our citizens, with multiple remote and Affiliate Partner locations providing access through linkages to the automated system.

Customers will have choices in the way they access information in the One Stop system through self-service, staff assisted self-service, or one-on-one individualized assistance. Information will be made available through electronic lobbies in One Stop Centers and Affiliate sites, printed and automated information in One Stop Center Resource Centers as well as Internet access to *Idaho Works*.

The communications network available to the system's customers affords the highest degree of choice in location of services. For remote areas, access is provided via the Internet. The *Idaho Works* system will also afford access in One Stop Partner locations and most secondary schools throughout Idaho. Although not all services will be available, core services, such as, registration for work, filing a job order, access to information on employment and training services, labor market information, job listings, and filing of UI initial and continued claims will be widely available on *Idaho Works*.

One of the primary goals of the One Stop system under WIA is to enable customers to make informed choices about employment and training opportunities. This effort includes making available a wide variety of information on labor market conditions, educational opportunities and performance and outcome data on training providers. Currently, *Idaho Works* provides numerous links with employment and training institutions as well as information made available through the Idaho Career Information System. Idaho will utilize Individual Training Accounts as an opportunity to improve customer choice in selecting training providers. As the state develops the Individual Training Accounts and the Eligible Training Provider system, the information developed on training providers will assist customers in making informed decisions regarding their training options.

Core, Intensive and Training Services

Adult and dislocated worker customers, including those with special needs, will have access to employment and training services delivered in progressively higher stages of intervention from core, intensive and training, as appropriate, to meet their individual needs. A description of core, intensive and training services to be provided with allotments received under WIA §132 is attached as Attachment 5.

- D. *What policies support a demand-driven approach, as described in Part I. "Demand-driven Workforce Investment System", to workforce development – such as training on the economy and labor market data for local Board and One-Stop Career Center staff? (§§ 112(b)(4) and 112(b)(17)(A)(iv).)*

Governor Kempthorne and the Workforce Development Council are moving Idaho toward a "demand-driven" workforce system with their visions and goals, and even more so with concrete actions. In both the Policy Academy and the Council's Goals and Objectives, several policies address the transition to a demand-driven system. Among these are projects described elsewhere:

- The Council has directed state agencies to work together and with the business community to improve labor market information, especially supply-demand information to inform planning and curriculum development, coordinate the development of career clusters for use across employment, education and economic development systems; expand outreach to better link business and education and support development of an entrepreneurial workforce.

- As part of their Workforce Information Plan, the state routinely provides training and information in Labor Market Information to planning and delivery staff. This is augmented by the wide distribution of information to business and the community at large.
- Governor Kempthorne's decision to create the new Commerce and Labor Department places a special focus on the demand side. During PY'05 training will be provided to staff in each one stop location to ensure the full integration of economic and community development services with the workforce services.

E. *What policies are in place to ensure that the resources available through the Federal and/or State apprenticeship programs and the Job Corps are fully integrated with the State's One-Stop delivery system? (§112)(b)(17)(A)(iv).)*

Job Corps has had a voice in the design and delivery of local youth activities through the linkages required above. Through these mechanisms, they had opportunities to assure appropriate access to youth activities for Job Corps participants. Although Job Corps is not represented on the Workforce Development Council, organizational representatives attend Council meetings and participate as needed in discussions affecting the population they serve. The Federal apprenticeship programs are utilized throughout the One-Stop delivery system as the need arises.

F. *Additional Policies not included above.*

- *Transitional Policies*

Except where listed in this plan as a state policy, policies listed in approved Local WIA Plans ~~will be~~ were utilized in PY'05 for the transition year. This ~~will~~ allowed for continuity of services as the state prepared for further efficiencies. The Idaho Workforce Development Council ~~will~~ reviewed policy changes during PY'05 with an eye towards providing consistency in treatment of system customers and efficiency in operations. *Starting in PY'05, the Idaho Workforce Development Council ~~will~~ began functioning as the statewide WIB and ~~will~~ assumed responsibilities previously held by WIBs prior to PY'05*

- *Reallocation policies;*

It is the State's policy to recapture from substate areas, all unexpended Youth and Adult program funds after the second year and the unobligated amount that exceeds 25% of funds allocated during the immediately preceding year (along with the corresponding 10% administrative funds), with adjustments for any allowable transfer between funding streams. Reallocations will be made to areas that have expended 100% of the prior (year two) year's allocation and exceeded the 75% obligational requirement for the year one funding. Reallocations will be made to each eligible local area, with the amount based on the relative amount allocated to such area for that funding stream for the prior program year, as compared to the total amount allocated to all eligible local areas in the state.

It is the State's policy to recapture 100% of all unexpended State 15% funds, 25% Dislocated Worker discretionary program funds that were allocated to the substate area, along with the corresponding 10% administrative funds, for the preceding year at closeout.

- *State policies for approving transfer authority (not to exceed 20%) between the Adult and Dislocated Worker funding streams*

The Workforce Council will recommend and the Governor will approve plans to transfer up to 20% of a program year's allocation between the adult and dislocated worker programs.

- *Hard-to-serve special participant populations*

The Governor has determined that no additional groups, other than those defined by Regulations, will be identified as “hard-to-serve” for purposes of granting exceptions to Individual Training Accounts.

- *State’s quality control standards for mentoring services*

In order to develop the workforce development system’s capacity to offer quality mentoring services, the State arranged for a nationally-recognized trainer to provide training to local Youth Councils, **former** local board staff, service providers, and other state and community partners on the steps to effective mentoring. Guidance provided by this trainer suggests that the effectiveness of mentoring services depends on a variety of factors, most critical of which are the appropriate selection and screening of mentors (including background checks on prospective mentors), adequate training of mentors to equip them to do quality mentoring, and the provision of ongoing support and supervision of mentoring.

While mentoring activities offer youth valuable opportunities for positive role-modeling, mentoring, because it involves the establishment of relatively unstructured one-on-one relationships between volunteers and youth participants, carries with it certain liability concerns that must be minimized to ensure protection for all parties involved.

It is the policy of the State that mentoring conducted under the auspices of WIA will be limited to site-based mentoring. In addition, in order to ensure that mentoring services offer maximum protection and quality experiences for both mentors and mentees, each local area will be required to establish procedures which ensure adequate screening of mentors (including background checks on all prospective mentors), mentor training, and the provision of ongoing support and supervision of mentoring activities.

Additional quality standards may be developed by the State in consultation with State and local partners.

- *Drug Testing*

The state does not currently require substance abuse testing of participants served under Subtitle B (Dislocated Workers, Adults and Youth). Instead, it is the State’s policy to encourage local One Stop Centers to use alternative screening systems, where appropriate, to identify and refer applicants as well as participants to existing treatment services provided by the state and available to the general public for alcohol and/or substance abuse.

- *Administrative Policies*

All local substate areas will use the Idaho Department of Commerce and Labor’s WIA participant MIS unless specific permission is granted to utilize other systems.

Any grant recipient utilizing a participant MIS system other than the Idaho Department of Commerce and Labor’s WIA participant MIS, must incorporate the following administrative requirements:

- Electronic transmittal, no later than the fifth day of each month, using a delimited ASCII file, of standardized records of individual demographic information, cumulative activities and services information, and outcome information for each active and terminated participant for the program year;

- Incorporation of the coding conventions for demographics, fund numbers, outcome information, cost categories, etc., controlled and defined by the Idaho Department of Commerce and Labor;
- Incorporation of additional coding conventions controlled and defined by the Idaho Department of Commerce and Labor to ensure accurate reporting of costs and performance for adult/dislocated worker services at the core/intensive/training levels;
- Incorporation of additional coding conventions controlled and defined by the Idaho Department of Commerce and Labor to ensure accurate reporting of in-school/out-of-school costs and performance.

Each grant recipient's financial system must incorporate the following administrative financial requirements to ensure capable and consistent financial management and financial reporting at the State level:

- Electronically submit, no later than the fifth day of each month, summary costs accrued and cash expended in three categories--individual participant, individual subgrant, and all other costs. These files are to be ASCII delimited files and are to be formatted in accordance with definitions from the Idaho Department of Commerce and Labor. Participant costs include all expenditures which directly benefit a participant such as wages, tuition, supportive services, fringe benefits, etc.
- The key to the summary expenditure records will be defined by the Idaho Department of Commerce and Labor. For example, the participant record key includes the Program Year, Report Month, Region Number, Site Number, Social Security Number of participant, Fund Number, Summary Cost Category and Detail Cost Category. In all three reports, the region will report one summary record for each unique key in their fiscal system;
- Electronic files must be reconcilable to the monthly Reports 33 and 34 filed by the IWB with the Idaho Department of Commerce and Labor. These electronic files will be submitted no later than the fifth day of each month;
- Incorporate coding conventions for fund numbers, cost categories, etc., used in the participant MIS system, which are controlled and defined by the Idaho Department of Commerce and Labor;
- For emergency situations resulting from lost warrants, late paperwork or hardship which threatens the continued participation of a client, financial systems must be capable of issuing emergency payments within 24 hours after receipt of request.

If a grant recipient's failure to transmit accurate participant/financial data is directly responsible for the State's failure to submit a valid federal report, or is accountable for the State's failure to submit a federal report within prescribed timeframes, and the State suffers a sanction which reduces funds to the State for the succeeding year, the responsible grant recipient will bear the full cost of the sanction.

- *Policies impacting participant eligibility*
- *State's definition of "deficient in basic literacy skills" for the purpose of youth eligibility.*

Local boards have been responsible for defining "deficient in basic skills".—The definition of "deficient in basic skills": must include a determination that an individual *who* (a) computes or solves problems, reads, writes, or speaks English at or below grade level 8.9 or (b) is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the

job, in the individual's family or in society. *Prior to FY'056, definitions included in approved Local Plans will be were utilized.*

- *Out-of-School Youth*

An out-of-school youth is defined as an eligible youth who:

- is a school dropout—an individual no longer attending any school and who has not received a secondary school diploma or its equivalent
- has received a high school diploma or GED but is basic skills deficient, unemployed or underemployed

For purposes of defining “underemployed out-of-school youth”, the State has determined that an employed youth who meets WIA income criteria may be determined underemployed. Further verification of this characteristic is not required.

- *Policy on Self-sufficiency*

An employed adult shall be considered self-sufficient if the family income exceeds 200% of OMB's poverty income level guidelines.

A reemployed dislocated worker shall be considered self-sufficient if the family income exceeds 200% of OMB's poverty income level, OR, he/she is employed in a permanent position that pays at least 90% of the qualifying layoff wage, whichever is higher.

- *Dislocated Worker Eligibility Timelines*

Two years will be established as the timeframe from which the layoff, termination or ending of self-employment occurred for dislocated worker eligibility purposes.

- *Unlikely to Return*

Four weeks of unemployed time shall be used to substantiate “unlikely to return” to the previous industry or occupation. The four weeks of unemployed time can be waived if the case manager can verify/document that the registrant is unlikely to return to a previous industry or occupation.

- *Duration sufficient to demonstrate attachment to the workforce*

Applicants must provide evidence that they have been employed fulltime (30 hours or more per week) in the same or similar occupation for at least one year out of the last three years immediately prior to registration, or they must otherwise demonstrate that they have had substantial attachment to the same or similar occupation for at least one year.

The term “substantial” is based on calculating the fulltime equivalency of work history. “Fulltime” is defined as 30 hours per week at a minimum, which calculates to 1,560 hours worked per year.

- *Substantial Layoff*

The state will incorporate the following definition from the Worker Adjustment and Retraining Notification (WARN) Act of 1988:

Any reduction in force which is not the result of a plant closing and which results in an employment loss at a single site of employment during any 30 day period of: a) at least 500 employees (excluding employees regularly working less than 20 hours per week) or b) at least 50

employees (excluding employees regularly working less than 20 hours per week), and at least 33% of the regular full-time workforce (excluding employees regularly working less than 20 hours per week).

- *Terminated/Laid off*

“Terminated/laid-off” refers only to involuntary discharge not for cause, and precludes enrollment of those individuals who were discharged for cause. Individuals may qualify as having been “laid off or terminated” when the cognizant Unemployment Insurance (UI) entity has adjudicated the case and determined that the quit was for good cause. In those instances where the applicant receives formal notification of monetary ineligibility for UI, the case manager may apply the rationale of “discharge not for cause” using information received from the employer regarding the individual’s separation.

- *General Announcement*

A verifiable form of communication from the employer, authorized representative or designee, informing the public or the employees of the business closure or substantial layoff which includes a planned closure date for the facility.

- *Self-Employed*

An individual who was self-employed (including but not limited to employment as a farmer, a rancher, or a fisherman) or was a contributing family member in a self-employment endeavor, but is unemployed due to business downturn or failure which occurred as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

- *Governor’s Group*

Individuals laid off or terminated due to natural disaster or severe economic downturn, as defined and approved by the Governor or his designated representative.

- Guidelines for documentation and verification of program eligibility for adult, dislocated worker, and youth services

To limit the risk of disallowed costs incurred for service to ineligible individuals, each grant recipient will be required to develop standards, procedures and forms for verifying the eligibility of all participants enrolled in the WIA program. For eligible adults and dislocated workers, the Grant Recipient must develop procedures to document the receipt of minimum (core/intensive) services and the information used by the One Stop operator to arrive at a determination that additional (intensive/training) services are required to obtain or retain employment.

ADULT SERVICES

- *Age 18 or older
- *Selective Service Registration (§189(h))
- *Authorized to work in the United States
- *Documentation of minimum services (core/intensive) and determination that additional (intensive/training) services are needed to obtain employment, or employment that will lead to self-sufficiency for those participants who are employed
- *Employed adult seeking intensive/training services, who does not meet the criteria for self-sufficiency (family income exceeds 200% of poverty)

DISLOCATED WORKER SERVICES

- *Age 18 or older
- *Selective Service Registration (189(h))

- *Authorized to work in the United States
- *Specific eligibility sub-parts found in the definitions of dislocated worker
- *Documentation of minimum services (core/intensive) and determination that additional (intensive/training) services are needed to obtain employment, or employment that will lead to self-sufficiency for those participants who are employed
- *Reemployed dislocated worker seeking intensive/training services, who does not meet the criteria for self-sufficiency (family income exceeds 200% of poverty), OR, is reemployed in a permanent position that does not pay at least 90% of the qualifying layoff wage (whichever is higher).

YOUTH SERVICES

- *Not less than 14 and not more than age 21
- *Selective Service Registration if 18 years or older
- *Authorized to work in the United States
- *Low income individual as defined in the Act
- *Is a member of one of the “eligible youth” categories identified in the Act
- OR-
- *Is not low income but is a member of one of the “exception groups” identified in the Act (limited to 5% of enrollees or fewer as determined by IWB)

- *Residency*

WIA adult, youth and dislocated worker intensive and training services will be limited to residents of the State of Idaho. Residents of other states who wish to receive WIA intensive and training services will first be referred to the one stop career center in their home state to obtain resources for services. First priority will be given to Idaho residents who are eligible for intensive and training services. In instances where a home state denies services to an out-of-state resident, the Idaho center may consider enrollment of the individual if it is in the best interest of the State of Idaho and no qualifying Idaho residents are denied access to services as a result.

- *Priority*

Priority will be given to adults who meet the general eligibility criteria requirements (18 years of age or older, comply with selective service registration requirements and comply with residency requirements) and are low income. In the provision of WIA services, veterans' priority will be followed in accordance with 38 USC Chapter 41, 20 CFR 1001.100 and PL 107-288.

- *Participant Follow-up*

For the duration of the 12-month follow-up period, a minimum of one contact with each exiter who received intensive or training services from a WIA program (adult, dislocated worker or youth) is required per quarter. Appropriate supportive services are allowable during the follow-up period.

- *Work Experience Activity*

The participation hours for this activity are limited to ensure participants are engaged in learning basic work maturity skills such as attendance, following directions and wearing appropriate attire as opposed to receiving occupational skill training. To ensure the intent of the activity, it is recommended the work experience policy read as follows:

Work Experience activities take place in a public, private for-profit or non-profit workplace for a limited period of time, generally not exceeding 520 hours. All participants enrolled in the Work Experience activity are to receive an hourly wage equivalent to the state or federal minimum wage, whichever is higher. Participants are provided with Federal

Insurance Contributions Act (FICA) and workers compensation coverage while participating in this activity.

- *Internship Activity*

All participants enrolled in the Internship activity are to receive an hourly wage at least equivalent to the state or federal minimum wage, whichever is higher. The wage may be higher depending on the participant's prior training/work experience and the hourly wage offered at the worksite to individuals with comparable training/work experience.

- *Out of Area Job Search Activity Limitations and Associated Cash Advance*

Out of Area Job Search - Each out of area job search is limited to 90% of actual costs up to \$600.
Out of Area Job Search Cash Advance - A job search cash advance is limited to 50% of estimated costs not to exceed \$300.

- *Relocation Assistance Activity Limitations and Associated Cash Advance*

Relocation - Relocation assistance is limited to 90% of allowable and actual costs not to exceed \$2,000.

Relocation Cash Advance - A cash advance for relocation is limited to 50% of the estimated costs for the trip, or \$750, whichever is lower.

- *Individual Training Account (ITA)*

No monetary limitations. Each ITA cost must be reasonable and necessary. Case managers will continue to adhere to the WIA requirement to coordinate available training funds where possible.

- *Needs-Related Payments*

Because of declining funds in WIA, the needs-related payment option has been eliminated.

- *Incentives and Bonuses*

A participant may receive a bonus or incentive from only one of the five groups listed below in a program year.

The Administrative Entity may approve incentives for special programs for youth with special circumstances.

1. \$50 will be offered to a youth participant as an incentive for each high school (core) credit earned with a minimum grade of a C (2.0 grade point average) as a result of WIA intervention. Cumulative payment of this incentive will be applied toward the participant's core classes, which are defined as English (including speech), mathematics, science (physical/biological) and social studies. Local school district policies regarding attendance requirements for awarding of incentive will be followed. A maximum of \$300 per program year may be applied toward this incentive.
2. \$50 will be offered to youth and participants as an incentive for each GED section passed during participation in the WIA Youth Program. Participants will participate in training and receive the accumulated incentive once competency is attained.
3. \$50 will be offered as an incentive to out-of-school, basic skills deficient youth for each area – literacy and numeracy – in which they demonstrate an increase of one or more educational functioning levels based on their pre- and post-test

scores. This incentive fund will be issued upon receipt of participant's post-test scores noting the increase in educational functional levels.

4. As an incentive to participate in the initial assessment (pre-test) necessary to meet the Literacy and Numeracy measure, \$20 will be offered as an incentive to youth who are out-of-school and basic skills deficient. This incentive will be paid upon receipt of the participant's scores from their pre-test.
5. Incentives may be awarded to project-based programs for at-risk youth. Payments will be based on attendance and performance criteria. Specific requirements must be included in the Service Provider Agreement.

- *Youth Barrier Group's "Requires Additional Assistance" and 5% Exceptions (Window)*

Youth Barrier Groups

An eligible youth is defined, under WIA sec. 101(13), as an individual who:

- A. Is age 14 through 21;
- B. Is a low income individual, as defined in the WIA section 101(25); and
- C. Is within one or more of the following categories:
 1. Deficient in basic literacy skills;
 2. School dropout;
 3. Homeless, runaway or foster child;
 4. Pregnant or parenting;
 5. Offender; or
 6. Is an individual (including a youth with a disability) who requires additional assistance to complete an educational program or to secure and hold employment. (WIA sec. 101(13).)

The State defines "Is an individual who requires additional assistance to complete an educational program, or to secure and hold employment" as follows:

1. Has repeated at least one secondary grade level or is one or more grade levels behind age-appropriate level
2. Has a core GPA of less than 1.5 or is a postsecondary student deemed by a school official to be on academic probation
3. Is at least two semester credits behind the rate required to graduate from high school for each year of secondary education
4. Is an individual who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English
5. Has a family history of chronic unemployment (during the two years prior to application, family members were unemployed longer than employed)
6. Is an emancipated youth
7. Is a current or previous dropout or is deemed at risk of dropping out of school by a school official
8. Has been suspended two or more times from school or has been expelled
9. Has been referred to or is being treated by an agency for depression or a substance abuse-related problem
10. Has experienced a recent traumatic event (within two years of application), is a victim of abuse, or resides in an abusive environment as documented by a school official or professional
11. Has aged out of foster care
12. Is a youth 16 years of age or older who has not held a job for longer than three months or is currently unemployed and was fired from a job within six months of application
13. Is participating in alternative education
14. Receives, or is a member of a family who receives cash payments under a federal, State or income based public assistance program
15. Has been determined eligible to receive Food Stamps within the six months prior to application

16. Is 18-21 years of age and has been unemployed for the last six months

5% Exception's (Window) "other eligible youth"

The State defines "other eligible youth who face serious barriers to employment as identified by the local board" as follows:

1. Has repeated at least one secondary grade level or is one or more grade levels behind age-appropriate level
2. Has a core GPA of less than 1.5 or is a postsecondary student deemed by a school official to be on academic probation
3. Is at least two semester credits behind the rate required to graduate from high school for each year of secondary education,
4. Is an individual who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English
5. Has a family history of chronic unemployment (during the two years prior to application, family members were unemployed longer than employed)
6. Is an emancipated youth
7. Is a current or previous dropout or is deemed at risk of dropping out of school by a school official
8. Has been suspended two or more times from school or has been expelled
9. Has been referred to or is being treated by an agency for depression or a substance abuse-related problem
10. Has experienced a recent traumatic event (within two years of application), is a victim of abuse, or resides in an abusive environment as documented by a school official or professional
11. Has aged out of foster care
12. Is a youth 16 years of age or older who has not held a job for longer than three months or is currently unemployed and was fired from a job within six months of application
13. Is participating in alternative education
14. Is 18-21 years of age and has been unemployed for the last six months

VII. Integration of One-Stop Service Delivery

Describe the actions the State has taken to ensure an integrated One-Stop service delivery system Statewide. (§§112(b)(14) and 121.)

- A. *What State policies and procedures are in place to ensure the quality of service delivery through One-Stop Centers such as development of minimum guidelines for operating comprehensive One-Stop Centers, competencies for One-Stop Career Center staff or development of a certification process for One-Stop Centers? (§112(b)(14).)*

Attachment 6 reflects major policies adopted to govern Idaho's One Stop system during PY'05. These policies will continue to be in place during PY'05 until the Council has an opportunity to review them. In PY'-05, the Workforce Development Council reviewed these policies to adapt them to the modified statewide structure. The Governor is proposing that all Commerce and Labor offices serve as one stop centers in the state to increase services to business and workers and to extend access to a comprehensive set of services areas across the state. This is reflected in Attachment 6-06.

- B. *What policies or guidance has the State issued to support maximum integration of service delivery through the One-Stop delivery system for both business customers and individual customers? (§112(b)(14))*

For PY'05, the state utilized the attached policy adopted for One Stop referenced above. Attachment 6 reflects the minimum level of services required in the One Stop Center by each partner organization in PY'05 while Attachment 6-06 reflects policies adopted for the council during PY'06. Governor Kempthorne's creation of Idaho Commerce and Labor supports the Council's goals for aligning economic and workforce development services and implements that goal by ensuring access to a comprehensive range of workforce and economic development services in each of the 24 offices.

- C. *What actions has the State take to promote identifying One-Stop infrastructure costs and developing models or strategies for local use that support integration? (§112(b)(14).)*

The State has taken a number of steps to assist in the development of models for cost sharing. A model MOU/Cost Sharing guide was developed by One Stop Partners at the state level to encourage flexibility in cost sharing. This was modeled on the USDOL One Stop Financial Management Guide and was made available to local areas and partners developing MOUs. The state also hosted USDOL training for local workforce boards and partners. Finally, the state One Stop partners operated a pilot to determine alternatives for cost allocation for partners who participate in the Centers on an ad hoc or itinerant basis. A pilot model based on a share of participants to allocate costs of space and other "common" services resulted in a determination that costs were immaterial and did not require allocation. All partners who use the centers of the primary locations utilize standard cost allocation plans consistent with USDOL guidance.

- D. *How does the State use the funds reserved for Statewide activities pursuant to (§§129(b)(2)(B) and 134(a)(2)(B)(v).) to assist in the establishment and operation of One-Stop delivery systems? (§112(b)(14).)*

The State supports the MIS and Financial Management Systems utilized by the One Stop Centers. In addition, the statewide funds are used to augment the support of the Regional Labor Economists to ensure the presence of an economist in each region to support business and individual customers. Finally, funds are reserved for training and technical assistance to one stop delivery staff. This includes a special contract with the Idaho Commission on Aging to advise on the special needs of older workers.

E. *How does the State ensure the full spectrum of assets in the One-Stop delivery system support human capital solutions for businesses and individual customers broadly? (§112(b)(14).)*

State policy ensures that information about the full complement of workforce information and services is available throughout the One Stop System. Because of our rural nature, many of our citizens live in remote areas. We have long relied on access through distributed access points in one stop and partner locations, extensive information and service access deployed through technology and an intensive training regime to ensure that front-line staff have the skills needed to connect customers to the appropriate services. This is backed by an on-going system that collects input on customer needs through forums, customer feedback mechanisms at service locations, and communication among service providers to identify opportunities and gaps. The state monitors at least one center in each region every year to test the availability of services and manages a customer satisfaction process to provide on-going feedback to the services that are provided. Projects to improve services are on-going both within partner organizations and through cross-agency teams such as those identified for the policy academy. These teams are currently focused on improved workforce information, creation of career clusters, development of common measures, identification of resources and service gaps and other projects that are aimed towards improving customer services for businesses and individual customers..

Some additional examples of how the state has ensured that the system supports human capital solutions are:

- Each of the one stop centers have been either remodeled or built new to create a business friendly environment. Modern electronic lobbies now provide access to all the resources available through the IdahoWorks electronic network. Each One Stop also offers a Business Resource Center with interview facilities and computer/copier/fax services available for employers' use.
- Major initiatives in staff training provided One Stop office staff with the opportunity to obtain national certification as Career Development Facilitators. As part of a major Business Relations Initiative, all One Stop staff are trained on various aspects of marketing One Stop services to business. This training has now been incorporated as a module in the CDF training.
- Technology is providing an increasing portfolio of customer services, including a new labor market information website, internet wage reporting and UI tax filing, and multiple options for listing job orders and receiving job applications. Internet web sites provide valuable information related to business workforce and economic development needs. Electronic job search available through the IdahoWorks system is making business needs visible to many more qualified applicants. Technology is providing more self-service options and this provided staff more time to offer customized service to business and job seekers.
- Each One Stop Office is actively reaching out to the local business community through participation in business oriented organizations and maintenance of a business advisory group to identify business service needs. The focus of Regional Labor Economists is being redirected to emphasize serving the specific labor market information needs of their local business communities as well as job seekers.
- The model for core business services at Idaho's One Stop Offices is based on the philosophy that business is the first customer, and services will be customized to whatever extent the customer requests.

- Upgrading technology, the systems and hardware, is an ongoing priority for the One Stop centers. Upgrading customer computers, enhancing front-end applications for customers as well as enhancements to staff's automation capabilities, on-line learning programs, and staff training that support professional certification are continuing.

VIII. Administration and Oversight of Local Workforce Investment System

A. Local Area Designations

1. *Identify the State's designated local workforce investment areas and the date of the most recent area designation, including whether the State is currently re-designating local areas pursuant to the end of the subsequent designation period. (§112(b)(5).)*

The State originally designated six workforce areas in December of 1998. One of these was entitled to mandatory temporary designation and five additional areas were designated under the Governor's authority for optional designation. No areas qualify for mandatory designation at this time allowing the Governor the opportunity to create efficiencies needed to accommodate the significant and continuing decline in funding. Governor Kempthorne announced his intent to allow the designations of all areas to expire with the expiration of the Five-Year plan and his desire to form a single statewide area. To accommodate regulatory barriers to his plan, the Governor has designated two areas which will form a consortium and function as a single statewide area under a plan for a regional statewide planning area until regulatory barriers can be removed.

The planned structure will be comprised of five former workforce areas and a special region designated as the east-central Idaho planning region. The eastern Idaho district will have the additional responsibility of fostering science and technology employment in conjunction with the Idaho National Laboratory and the state's educational institutions. That region's economy remains the beneficiary of a special \$30 million fund created in 1995 as part of Idaho's nuclear waste cleanup agreement with the federal government. See Attachment 7 for a map of the regions.

2. *Include a description of the process used to designate such areas. Describe how the State considered the extent to which such local areas are consistent with labor market areas: geographic areas served by local and intermediate education agencies, post-secondary education institutions and area vocational schools; and all other criteria identified in section 116(a)(1) in establishing area boundaries, to assure coordinated planning. Describe the State Board's role, including all recommendations made on local designation requests pursuant to section 116(a)(4). (§§112(b)(5) and 116(a)(1).)*

The state has a small population spread over a large geographic area. The state is generally organized into six substate planning areas for state programs and post-secondary educational service areas. Each area contains at least one SMSA and multiple K-12 districts. These planning areas will continue to be used for resource allocation and tracking to ensure equitable distribution of funds to all parts of the state, but adequate funds are not available in the six regions to independently and "effectively administer the activities carried out" under WIA Title IB.

The State announced Governor Kempthorne's intent to form a single state area on April 15th via conference calls to the Chair of the Local Elected Officials' organization in the current workforce areas and their WIB Chairs, Executive Director and WIB Director. On April 18th, a letter providing more information was sent to the same group of individuals. The Workforce Development Council (Council) was advised of the Governor's proposal at that time. The Council considered testimony and applications from the six workforce areas together with comments from the general public at their meeting on May 11th. The Council also considered the Governor's proposal for restructuring. At their meeting, the Council heard testimony that the local boards were valued in their communities and that funds could be raised to support them. After considerable discussion, the Council remained split but voted to move the recommendation for the Governor's proposal forward for the Governor's

consideration along with all other proposals and an evaluation of those proposals. The Council also voted to recommend to Governor Kempthorne that, if local funds were made available to fully support the cost of the WIBs and their staff, local elected officials be allowed to retain their local boards under the new structure.

After careful consideration of the issues presented, Governor Kempthorne designated two regions, the special eastern Idaho district known as region VI and the Balance of the State, for the life of the five-year plan. At the same time, the State will recognize the existing local WIBs in the substate regions and solicit their advice if local elected officials choose to maintain them using other state or local funds.

3. *Describe the appeals process used by the State to hear appeals of local area designations referred to in §§112 (b)(5) and 116(a)(5).*

Denial of Automatic or Temporary and Subsequent Designation

A unit of general local government or grant recipient may appeal the denial of a request for automatic or temporary and subsequent designation as a local workforce investment area under sections 116(a)(2) or 116(a)(3) of the Workforce Investment Act.

All such appeals shall be in writing and be filed within twenty (20) calendar days of the date the denial letter was mailed by the Governor or the Governor's designee. The appeal must include all factual and legal arguments as to why the appeal should be granted. The appeal shall be filed with the Chair of the State Council, Idaho Department of Commerce and Labor, Workforce Systems Bureau, 317 West Main Street, Boise, Idaho 83735. The Chair of the State Council, or the Chair's designee, shall promptly acknowledge receipt of the appeal.

The workforce areas designated in this plan will continue while the appeal is in progress and will be modified should the initial denial of designation be overturned.

(a) Appeal to the State Council

The appeal shall be deemed timely filed if it is received by the Chair of the State Council within the 20-day period, unless the appeal is filed by mail, in which case the official postmark affixed by the U. S. Postal Service shall be deemed to be the date of filing. Any appeal that is filed late shall be summarily dismissed.

The Chair of the State Council will select a hearing officer. The appeal shall be heard by the hearing officer not more than thirty (30) days after the appeal was filed. With the consent of the appealing party, the hearing may be held after the 30-day period, but in no case shall the hearing be conducted more than sixty (60) days after the appeal was filed.

The hearing officer shall inform the appellant of the date, time, and place of the hearing by written notice mailed at least ten (10) calendar days in advance. The appellant shall have the right to present testimony and documentary evidence, to offer evidence in rebuttal, to present oral argument and to be represented by legal counsel. All testimony received by the hearing officer shall be under oath or affirmation. If the appellant retains legal counsel, federal WIA funds cannot be used for remuneration.

An appellant must establish that it is entitled to either automatic or temporary and subsequent designation as a local area under sections 116(a)(2) or 116(a)(3) of the Workforce Investment Act.

Within fifteen (15) days of the hearing, the hearing officer shall issue a recommended decision, which shall include findings of fact, recommendations, and the basis therefore. That decision shall be mailed to the appealing party. The hearing officer shall file a copy of the recommended decision with the Chair of the State Council.

The recommended decision of the hearing officer shall be placed on the agenda of the next Council meeting for disposition; however, if no council meeting is scheduled within forty-five (45) days of the date the decision was issued, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within that 45-day period to accept, reject, or modify the hearing officer's recommended decision.

In its deliberations, the Council shall consider only the evidence presented to the hearing officer. The Council shall not receive or consider any evidence not presented to the hearing officer. The decision of the Council shall be reduced to writing and be mailed to the Governor and the appealing party. The decision must set out in summary fashion the Council's findings and conclusions. The Council may adopt, in whole or in part, the findings of fact, recommendations, and rationale of the hearing officer.

(b) Appeal to USDOL

If a timely appeal of the decision does not result in the requested designation, the unit of general local government or grant recipient may further appeal the designation decision to the U.S. Secretary of Labor within thirty (30) days after receipt of the Council's written decision. The appeal to the Secretary must be consistent with the requirements of the Workforce Investment Act. The Secretary, after receiving a request for review and upon determining that the entity was not accorded procedural rights under the appeal process established in the State Plan, or that the area meets the requirements of Section 116(a) paragraph (2) or (3), as appropriate, may require that the area be designated as a local area.

- B. *Local Workforce Investment Boards -- Identify the criteria the State has established to be used by the chief elected official(s) in the local areas for the appointment of local board members based on the requirements of section 117. (§§112(b)(6) and 117(b).)*

The certification package (Attachment 8) is included at this time and will be used, to the extent possible, to direct activities during PY'2005. Because local boards will no longer "administer" WIA funds, the Council will consider alternative structures proposed by local elected officials in those areas. A map of the two areas and the substate regions may be found in Attachment 7.

- C. *How will your State build the capacity of Local Boards to develop and manage high performing local workforce investment system? (§§111(d)(2) and 112(b)(14).)*

With the shift to a statewide structure, this will not be applicable effective July 1, 2005.

- D. *Local Planning Process -- Describe the State mandated requirements for local workforce areas' strategic planning. What assistance does the State provide to local areas to facilitate this process, (112(b)(2) and 20 CFR 661.350(a)(13).) including*
1. *What oversight of the local planning process is provided, including receipt and review of plans and negotiation of performance agreements? And*

The attached guidance was provided to local areas for the PY'05 planning year (see Attachment 9 for WIAB-08-04 and Attachment 10 for the Local Planning Guidance). The state asks for major modifications by April 1 in draft with final plans due May 15th. Minor

modifications are due June 1. One area has submitted a major modification for review at this time.

2. *How does the local plan approval process ensure that local plans are consistent with State performance goals and State strategic direction?*

The state workforce agency will review these plans for consistency with policy, regulation and this plan and notify the local area of their approval or need for change. In the case of major modifications, a recommendation will be considered by the council on the draft plan and state staff will review the final plan consistent with those recommendations before forwarding to the Governor. Minor modifications will be managed at the administrative level. Because Idaho is moving towards a single state area approach, all regions will be subject to the performance measures required of the state. Typically local plans are written after the state has established the policy framework. Because of the time frames for this planning process, most local policies had been established and procurement processes conducted before the state plan was published. Policies approved in this plan will take precedence over those in the local plans.

E. *Regional Planning (§§112(b)(2) and 116(c).)*

1. *Describe any intra-State or inter-State regions and their corresponding performance measures.*

Beginning with the planning cycle for PY'06, a single plan will be developed for the entire state covered by the Idaho Workforce Consortium in the statewide regional planning area. The purpose of this regional plan is to create efficiency and to allow for sharing of information and data across all substate regions, increasing the amount of funding available for services to customers and creating better alignment of workforce and economic development services. Because this is statewide, performance measures will be those negotiated with USDOL and reflected in Attachment 11.

Negotiated performance levels for PY'06 have been approved by USDOL and are now included as a new Attachment 11 for this plan.

2. *Include a discussion of the purpose of these designations and the activities (such as regional planning, information sharing and/or coordination activities) that will occur to help improve performance. For example, regional planning efforts could result in the sharing of labor market information or in the coordination of transportation and support services across the boundaries of local areas.*

The designation is for the purpose of creating efficiency and is done pending regulatory relief for the designation of a single state area. With limited funding, it is essential that the state identify every opportunity for eliminating duplication to maximize opportunities for our citizens and businesses. This also ensures better alignment of workforce services with economic development, community development and education services and will facilitate improved coordination of state funds to serve high priority groups of at-risk youth.

3. *For inter-State regions (if applicable), describe the roles of the respective Governors and State and local Boards.*

No inter-state regions are planned at this time.

F. *Allocation Formulas (112(b)(12).)*

1. *If applicable, describe the methods and factors (including weights assigned to each factor) your State will use to distribute funds to local areas for the 30% discretionary formula adult employment and training funds and youth funds pursuant to §§128(b)(3)(B) and 133(b)(3)(B).*

Substate Adult and Youth Allocations

The state will maintain existing policies to allocate funding to the substate planning regions. The State will not use alternative factors to allocate up to 30% percent of the funds to the local areas. All Adult and Youth program funds will be allocated using the three required factors of areas of substantial unemployment, excess unemployment and economically disadvantaged. The required factors that will be used are:

Adult Program:

1/3 of the funds allocated on the number of unemployed residing in areas of substantial unemployment (6.5% or higher unemployment)

1/3 of the funds allocated on excess unemployment (number of unemployed over 4.5%)

1/3 of the funds allocated on the number of economically disadvantaged adults

Youth Program:

1/3 of the funds allocated on the number of unemployed residing in areas of substantial unemployment (6.5% or higher unemployment)

1/3 of the funds allocated on excess unemployment (number of unemployed over 4.5%)

1/3 of the funds allocated on the number of economically disadvantaged youths

2. *Describe how the allocation methods and factors help ensure that funds are distributed equitably throughout the State and that there will be no significant shifts in funding levels to a local area on a year-to-year basis.*

To ensure that local areas experience no significant shifts, the hold-harmless provisions and stop-gain provisions defined under WIA are applied. Hold-harmless levels are based on 90% of an area's relative share of the previous two years of funding. Stop gain is based on 130% of the area's relative share of funding in the prior year.

3. *Describe the State's allocation formula for dislocated worker funds under §133(b)(2)(B).*

The State will allocate dislocated worker funding to the local areas based upon information that will include insured unemployment data, unemployment concentrations, plant closing and mass layoff data, declining industries data, farmer-rancher economic hardship data, and long-term unemployment data. No other informational factors will be used. The data to be used and the weights applied to each factor follow:

Weight	Factor
0.320	Average number unemployed
0.320	Average number unemployed over the state's rate
0.320	Number of UI claimants with 15 weeks claimed and 0 earnings
0.010	Number of workers from plant closures
0.010	Number of workers from Mass Layoffs expected to last 90 days or longer
0.010	Industry employment declines by annual average monthly employment
0.010	Number of FHA borrowers who are bankrupt or delinquent
1.000	Total

4. *Describe how the individuals and entities on the State Board were involved in the development of the methods and factors, and how the State consulted with chief elected officials in local areas throughout the State in determining such distribution.*

The state is not proposing changes to its allocation formula. The original formula was widely reviewed throughout the state, with substantial input of the local elected official organizations, their workforce investment boards and the public.

G. *Provider Selection Policies (§§112(b)(17)(A)(iii), 122, 134(d)(2)(F).)*

1. *Identify the policies and procedures, to be applied by local areas, for determining eligibility of local level training providers, how performance information will be used to determine continuing eligibility and the agency responsible for carrying out these activities.*

The Workforce Investment Act requires that the State and local boards approve training providers before WIA funds can be used to pay for occupational training. Current providers on the list were approved by local workforce boards and will remain on the state list subject to continued performance. With a change in structure, the Workforce Development Council will function as a local board for purposes of approving providers to be included on the list.

The state submitted a waiver from subsequent eligibility requirements to ensure a wide variety of training options would be available to enrollees. Idaho's education community, led by the State Board of Education, has established extensive reporting requirements and approval processes for all public programs. The implementation of WIA program requirements has helped to support and enhance these efforts whenever possible.

The goals for Idaho's Eligible Training Provider system are to maximize customer training options, improve customer information and comply with WIA requirements. Idaho created the Eligible Training Provider system in accordance with the following guiding principles, as it:

- Ensured that quality-training options were available for WIA participants on July 1, 2000, while setting the foundation for a training provider Consumer Report over the next several years.
- Developed the Eligible Training Provider system in close coordination with public and private training providers and the State Workforce Development Council.
- Focused the statewide system on training programs that led directly to occupations and/or careers.
- Maximized local services delivery options by excluding intensive services from the Eligible Training Provider requirements. Intensive services include such activities as basic skill training, training in quality practices, basic computer software training and general preparatory services.

- Built upon existing systems established by the State Board of Education and Idaho's Education agencies.

Implementation Strategy

The Workforce Investment Act defines two types of eligible training providers: those "initially" eligible to provide services during the first implementation year, and those "subsequently" eligible based on an annual review of performance and cost information.

A. State Policies for Initial Eligibility

The Department of Commerce and Labor will work closely with the State Workforce Development Council in encouraging training providers throughout the state to apply for initial eligibility. The Department and the Council have established the criteria for approving applications for initial eligibility. To have a program included on the list, the training providers will be required to list each training program and the training costs/fees. Training providers will also certify compliance with debarment and nondiscrimination policies. In addition, Idaho Code requires that all proprietary schools operating in the State of Idaho must register and hold a valid certificate of compliance issued by the State Board of Education. All applications for the Eligible Training Provider system must be submitted to the Idaho Department of Commerce and Labor, the Council's designee, for tentative approval. Those tentatively approved will be submitted to the State Workforce Development Council for formal approval of training providers for inclusion to the State Eligible Training Provider List (ETPL).

Training providers who qualify for automatic designation who submit the above information will be eligible for inclusion on the list. These providers include:

- a postsecondary educational institution that is eligible to receive Federal funds under title IV of the Higher Education Act of 1965 and provides a program that leads to an associate degree, baccalaureate degree, or certificate, or
- an entity that carries out programs under the Act commonly known as the National Apprenticeship Act

For those providers not covered by automatic designation and who may currently be providing training programs, the State determines the appropriate performance and program information requirements as well as appropriate performance expectations. An example of this would be out-of-state training providers, who are not on Idaho's Eligible Training Provider List, but are on their respective State's list of WIA eligible training providers.

The establishment of appropriate performance expectations requires a valid database on training provider outcomes. Currently in Idaho there is a lack of standardized verifiable outcome data on training programs and thus no valid database is available to establish appropriate statewide performance expectations. Due to the absence of a valid statewide database, the State has not established statewide performance levels. Rather the state Workforce Development Council will determine initial eligibility based on such factors as training content and costs. The Council, through its designee, will approve training programs that will contribute to their efforts to offer a wide range of quality services. In order to maximize opportunities for training provider participation, the Council will accept applications on an ongoing basis. The State believes that this

approach maximizes the flexibility in approving initial providers and increases opportunities for participation of training providers. This approach helps to assure that as many training options as possible will be available for all WIA participants, while a valid training provider outcome database is being developed.

1. WIA Subsequent Eligibility Requirements

WIA states that a provider's initial eligibility period may last up to eighteen months. To maintain subsequent eligibility, all training providers will be required to submit program information and meet performance levels as listed in WIA 122 (d).

B. State Policies for Subsequent Eligibility

The WIA requirements for subsequent eligibility have proved more prescriptive and challenging to implement. Under WIA, States are allowed to use the initial eligibility process for Eligible Training Providers for eighteen months. After this period, States are required to implement the subsequent eligibility requirements outlined in Section 122 (c) and (d) of the WIA legislation. These provisions require that training providers provide outcome data, not only on the WIA participants, but on all students that are served through their programs. However, the WIA subsequent eligibility requirements cannot be effectively or economically implemented in Idaho and pursuing this course would result in a dramatic reduction in the number of training providers that would be willing to participate in the WIA system.

USDOL waived the 18-month time limit on initial eligibility, extending this period through June 30, 2005. The state will request an extension until June 30, 2007. The extension of the initial eligibility period essentially provides temporary relief on the subsequent eligibility issues and ensures that our training activities and expenditures are in compliance with federal requirements.

The subsequent eligibility concerns are a national issue and are being reviewed as part of the WIA reauthorization process. We will continue to encourage flexibility for states in devising appropriate systems. In the interim, we will continue to utilize our current policies on initial eligibility to maintain our Eligible Training Provider List.

2. *Describe how the State solicited recommendations from local boards and training providers and interested members of the public, including representatives of business and labor organizations, in the development of these policies and procedures.*

The development of the Eligible Training Provider system required close coordination and extensive input from the employment and training community. At the state-level, the Department of Labor created an Eligible Training Provider Committee to assist in the development of the policies. The Committee included representatives from the Division of Professional-Technical Education, State Board of Education and the Idaho Career Information System. Staff from the Division of Professional-Technical Education assisted by providing information to the State's six postsecondary Technical colleges. During its initial development, the Department also worked closely with the local Idaho Works Boards in the development of the policies and application for statewide use. The state also sought policy input from the Idaho State AFL-CIO. These policies were available over the Internet for public review and comment. During the initial eligibility process, Idaho's goal is to maximize training provider participation. Inclusion on the initial list of

eligible providers will help facilitate opportunities with those training providers for additional input in the development of the subsequent eligibility policies.

3. *How will the State maintain the State's eligible training provider list?*

Training providers will apply for participation in the WIA program through the state Workforce Development Council's designee, the Idaho Department of Commerce and Labor. To maximize opportunities for training provider participation, the Department will accept and review applications on an ongoing basis. The approved programs that have been reviewed by the Department will be consolidated in a statewide list and included in the Department of Commerce and Labor's website. The list will be updated as new providers are approved. Providers found to be lacking current information will be contacted and allowed an opportunity to update their training information. If there is no response to the request for program updates, the provider will be notified that they will be removed from the list if the Department does not receive any communication from them within 30 days.

4. *Describe the procedures the Governor has established for providers of training services to appeal a denial of eligibility by the local board or the designated State agency, a termination of eligibility or other action by the board or agency, or a denial of eligibility by a One-Stop operator. Such procedures must include the opportunity for a hearing and time limits to ensure prompt resolution.*

As the State's Workforce Development Council's WIA designee, if the Department of Commerce and Labor determines that an eligible provider intentionally supplies inaccurate information during their eligibility determination process, the provider will be removed and terminated from the list for no less than two years. When Idaho is successful in developing appropriate performance expectations for training providers, those training providers who do not meet required performance levels will be removed and terminated from the Eligible Training Provider List.

All applications for the Eligible Training Provider system must be submitted to the Department of Commerce and Labor for tentative approval, with formal review and approval at the next Council meeting. The Department, as the Council's designee, will provide a written notice of determination of eligibility/ineligibility to the training provider within 60 calendar days of the receipt of the application. Notification will be sent by certified mail. The written notification will include the specific reason(s) for ineligibility, if applicable, and will inform the ineligible training provider of the appeal process.

Formal Hearing-Appeal

Within 14 calendar days after receipt of the Department's determination of ineligibility or termination, the training provider may file a written request to receive an appeal by formal hearing. A provider will have the option of presenting their case to a Hearing Officer or to the Performance Committee of the Workforce Development Council. An appeal overseen by a Hearing Officer will be scheduled within 90 calendar days from the receipt of the request for a hearing. An appeal overseen by the Performance Committee will be scheduled at the time of the next Workforce Development Council meeting, provided there is at least 14 days before the next meeting. The hearing shall include an opportunity for the applicant to submit written and verbal information to the presiding entity. The presiding entity will issue a decision within 60 calendar days from the date the hearing takes place. The decision of the presiding entity shall be final.

5. *Describe the competitive and non-competitive processes that will be used at the State level to award grants and contracts for activities under title I of WIA, including how*

potential bidders are being made aware of the availability of grants and contracts. (§112(b)(16).)

With the functioning of the state as a single statewide planning area, WIA funds may be awarded to state agencies for delivery of local services without regard to competition based upon the recommendation by the Idaho Workforce Development Council. This is not intended to diminish competition; rather it is intended to allow the state to continue offering services as a primarily provider of WIA Adult, Youth and Dislocated Worker services.

In addition, competitive and noncompetitive processes used at the state level to award WIA grants and contracts will follow procedures established by the Idaho Department of Administration which are based on OMB Circular A102, except as stipulated in the attached agreement (Attachment 12), which was negotiated with that Department.

This agreement formed the basis for a *WIA Procurement Guide* that is now in effect and will remain valid until passage of the new legislation or if modification is deemed necessary.

This agreement allows the State to use alternative procedures, consistent with OMB Circular A102 as reflected in the WIA Procurement Guide for the purchase of program services at the state level.

As indicated above, state agencies will be allowed to purchase goods and services from other state agencies without competition.

Bidders are notified of fund availability through use of a bidders' list and through legal notices published in regional newspapers across the state.

6. *Identify the criteria to be used by local boards in awarding grants for youth activities, including criteria that the Governor and local boards will use to identify effective and ineffective youth activities and providers of such activities. (§112(b)(18)(B).)*

Upon the recommendation of the Idaho Workforce Development Council, Idaho Commerce and Labor and other state agencies may deliver youth services in the one stop system without regard to competition. This is not intended to limit opportunities for competition, only to accommodate the move towards a statewide regional planning structure. The criteria used to evaluate proposals for needed youth services vary according to the type of services and outcomes being procured. The State Workforce Development Council has established the following broad parameters to be used as the template by which proposals and programs are approved for funding and measured for success:

Youth proposals and programs will be judged according to the degree to which they offer youth:

- Services tailored to their individual needs;
- A variety of contextual educational options to attain skill competencies;
- Continuity of contact with caring, competent adults;
- A focus on work opportunities as a means to teach skills;
- Bona fide connections to employers;
- Leadership development opportunities;
- Positive peer support;
- Opportunities for postsecondary education;
- Positive social skill development;

- Availability of supportive services during and following participation over a sustained period of time;
- Opportunities for participants to be an integral part of program design;
- Services provided by qualified staff; and,
- A commitment to high levels of customer satisfaction and outcome goals appropriate to the population.

It is not intended that all of the criteria be used in every program. The Council encourages a sharp program outcome focus, coordination with other youth services, and innovative designs which might require tailoring the criteria to a specific program design.

In addition to using the common and WIA performance measures for youth, program effectiveness will be measured by criteria contained within the procurement document(s) and, if appropriate, past history/experience of the service provider.

H. *One-Stop Policies* (§112(D)(14).)

1. *How will the services provided by each of the required and optional One-Stop partners be coordinated and made available through the One-Stop system. Include how the State will consolidate Wagner-Peyser Act funds to avoid duplication of core services. (§112(b)(8)(A).)*

To a large extent, the Act and Regulations were deemed adequate to set the original framework for the One Stop system. During PY'05, the Workforce Development Council will again review policies to determine if the following are adequate or if changes should be made to those policies. For activities conducted in PY'05, agreements for services were developed under the existing policy framework. A brief explanation of the policies follows:

- The LEO-IWB partnerships are encouraged to seek additional voluntary partners beyond those listed at 121(b)(1);
- Only those partners designated at 121(b)(1) will be deemed required partners;
- No additional services beyond those specified in the Act will be required, although additional service elements appearing in the existing system are encouraged to continue;
- Required One Stop partners must make their applicable core services available and provide access to other services in at least one physical One Stop Center within each workforce region;
- Required partners may utilize any authorized methodology contained in the WIA to deliver core services in the One Stop Center provided that it is
 - Consistent with the WIA and the authorizing legislation;
 - Does not require the partner to travel to another location; and
 - Meets minimum standards of accessibility as defined in WIA §188(a)(1);
- Partners are encouraged to offer access to services by ensuring awareness of system services at all points of entry;
- Partners are encouraged to become Affiliates by entering into MOUs and maintaining access to the Idaho Works systems, offering assisted service to those who require it and maintaining current and accurate information for access through the Idaho Works information system.

To avoid duplication of Wagner-Peyser services, Idaho Commerce and Labor has relied on a strategy of automating services to make them widely available at all points of service access. Throughout the system, businesses, consumers and partner organizations can access the labor exchange and workforce information services via the Internet. By bringing the services to customers at any location, partners are able to take advantage of these services at their service sites as

well. A special emphasis has been made to use Wagner-Peyser as the primary provider of core services in one stop centers housed in Commerce and Labor facilities.

2. *Describe how the State helps local areas identify areas needing improvement and how technical assistance will be provided.*

Extensive technical assistance and strategies to identify improvement areas have been implemented to assist in supporting the One Stop system in Idaho. Many of these activities were identified by state and local partners as priorities for improving service delivery among One Stop partner programs. Partners at both the state and local level have agreed in the cooperative agreements and memoranda of understanding to engage in a regular system of program review and continuous improvement to identify specific areas needing further attention. One of the top priorities for PY'05 is to expand the capacity of the One Stop Centers to offer a broader range of business services, including the full range of economic development and community development services.

The technical assistance activities listed below are intended to further integrate services among partners in the One Stop system.

- With the move towards a statewide planning region, the State is committed to continue funding the ongoing operating costs and enhancements of a financial and management information system. This system provides a platform for further integration of systems beyond the Idaho Commerce and Labor's family of programs and assures consistency among the service areas.
- The State operates a quarterly continuous improvement process that utilizes a set of interim indicators and other data available on the MIS to identify areas needing attention to ensure achievement of goals. The WIA Management Information System (MIS) is a proactive tool that, in addition to identifying conflicting and missing data as a means to increase performance in meeting goals, also has the ability to produce numerous reports. The reports generate data that provide participant activity, demographic, exit, and customer satisfaction data. Additionally, reports are generated to provide outcome information to assist with interim measures – or data collected at participant exit. Financial reports are available as well. The data generated by these reports are a means to identify specific areas for improvement at all system levels, i.e. provider, local, and state.
- The State also will set aside funding each year to offer direct assistance to the One Stop system. This funding will be used to support operating costs of the WIA Internet website and provide software enhancements to improve customer access to services and information through the Idaho Works system and other system building needs identified at the local level.
- Funding will be set aside on an annual basis to finance capacity building using contracts with consultants, training conferences or other methods identified at the State and local level. A portion of these funds will be directed to the One Stop system and may be used for frontline and administrative staff.
- The State has entered into an agreement with Idaho Commission on Aging (ICOA) to assist with identifying strategies to increase older worker service levels at the local level. ICOA's provision of technical assistance with the One Stop system ensures that employment and training services are provided to low-income level older worker populations.
- Areas needing improvement are also identified during the monitoring process, as outlined in paragraph I. below. State staff utilize this opportunity to provide technical assistance as appropriate.

- The State maintains training programs for local service delivery staff. Instruction is provided for Career Development Facilitators (CDF), software, and program-specific technical training is provided as needed. Training is routinely open to partner agency staff as well. Idaho Commerce and Labor has several major training initiatives that help to ensure continuous improvement in the quality of services provided. These initiatives include:
 - Career Development Facilitators (CDF) program. This program provides for professional development for Idaho Commerce and Labor staff with nationally recognized training as Career Development Facilitators. This training was designed for staff to acquire knowledge developed by the National Career Development Association, the professional association for career development in the United States. All Idaho Commerce and Labor local office staff participate in this training program.
 - Management development has also been a focus for delivering quality customer service over the long term. Similar to many other organizations, Commerce and Labor is faced with the prospect of large numbers of senior manager retirements over the next few years. As a proactive measure, departmental representatives participated in a state team that developed a program for Certified Public Managers. The program is operated by the Division of Human Resources but is used extensively by the Department to support its development of a cadre of trained managers.
 - Capitalizing on the Department's technological expertise, the use of on-line learning is prevalent and growing across the agency. Given the large distances between the many local offices across the state, the traditional "gather together in a central place for training" approach is a financially unsupportable model for providing the constant flow of training opportunities needed to serve the needs of new staff, programs, and technology. During the past two years, Idaho Commerce and Labor has dedicated significant resources toward developing a library of on-line learning modules that are available to staff via the internet at any time. Several of the modules are targeted to new staff and sometimes serve as pre-requisite courses before attendance at planned instructor-lead training. As a means to keep the training as interactive as possible, the agency is experimenting with combining on-line training with instructor and/or group interaction through its Web Meeting Technologies. More traditional face-to-face group training is also supported through maintenance of five high tech learning labs in the largest local offices in five regions of the state.
 - A Learning Management System is currently under development and will be used to help plan, coordinate and track the training experiences of staff across the Department.
 - As a result of the recent merger of the Department of Commerce and the Department of Labor, "Idaho Commerce and Labor" is revising all its current marketing messages, brochures and documents to reflect the expanded mission and services. A new agency website and homepage has been created to present the agency mission - "We create jobs, strengthen communities, and market Idaho" - and to provide customer support through expanded links to the many program-oriented web pages that were maintained previously by the two agencies. Considerable time and effort has been spent revising menus and creating links to provide connections to both economic and workforce development resources when appropriate. Several websites were maintained by the two agencies and work continues to integrate them.
3. *Identify any additional State mandated One-Stop partners (such as TANF or Food Stamp Employment and Training) and how their programs and services are integrated into the One-Stop Career Centers.*

No additional partners have been mandated.

- I. *Oversight/Monitoring Process -- Describe the monitoring and oversight criteria and procedures the State utilizes to move the system toward the State's vision and achieve the goals identified above, such as the use of mystery shoppers, performance agreements. (§112(b)(14).*

The Workforce Development Council maintains a standing Performance Committee to oversee the workforce development system and assess progress towards its goals. As part of this process, the Council has directed staff to develop a system of integrated measures to test performance on a regular basis. Staff of the workforce agencies collaborate to implement Council goals and routinely report on progress.

At the operational level, the state utilizes monitoring to identify issues needing attention and to provide technical assistance. A quarterly continuous improvement process measures achievement of goals, identifies issues that require attention from the service provider or the state and provides the foundation for our routine monitoring and technical assistance activities.

The state ensures that procedures are in place to monitor compliance with the Act, regulations, and state policies. At a minimum, such procedures shall comply with the following monitoring requirements for internal and subrecipient activities:

- Subagreements reviewed. Annual monitoring reviews shall be performed on all subagreements of \$75,000 or more. Subagreements under \$75,000 shall be monitored at a level equal to 20% of the funds awarded in the category. A minimum of fifteen percent of WIA-funded work/training sites active at the time of the review scheduling shall be monitored.
 - Items reviewed. Compliance monitoring of subagreements shall include reviews of compliance with the Act and Regulations, and where applicable, performance under the One Stop MOU, financial management systems, procurement procedures, program management procedures, record keeping procedures, participant activities and treatment, performance of agreement terms, corrective action and continuous improvement processes and eligibility verification processes.
- J. *Grievance Procedures. (§§122(g) and 181(cc).) Attach a copy of the State's grievance procedures for participants and other affected parties (including service providers.)*

The Grievance Procedures are included as Attachment 13.

- K. *Describe the following State policies or procedures that have been developed to facilitate effective local workforce investment systems (§§112(b)(17)(A) and 112 (b)(2).*

To ensure a continuum of service delivery during the PY05 transition year, the Workforce Development Council will recognize the participant eligibility definitions and the One Stop Operators designated by local boards under the policies reflected in this section. As the Workforce Development Council moves toward a single state system and a broader One Stop vision, these policies will be reviewed and possibly modified for PY06. The State Agency will make every reasonable effort to honor program decisions made by local workforce boards for PY'05. Contracts for services of the Regional One Stop Operator will be negotiated by state staff.

1. *State guidelines for the selection of One-Stop providers by local boards;*

The following criteria were used by local boards to selected One Stop Operators. With one exception, the same operator has been in place since the implementation of WIA offering continuity of services.

One Stop Operators may be designated through (a.) a competitive process, (b.) through designation of a consortium or (c.) through the grandfathering of an eligible existing system.

- a. Competitive processes used to select One Stop Operators must follow local procurement policies and those established by the State.
- b. The following process for designation of an Operator under the consortium option shall be used:
 - (1) The local Workforce Investment Board may consider a request submitted by a consortium of three or more required One Stop Partners for designation as a One Stop Operator without regard to competition;
 - (2) The local Workforce Investment Board will provide notice to the public for a period of thirty days (30) prior to designation if it intends to designate the consortium as the Operator;
 - (3) The local Workforce Investment Board will designate the consortium, not its individual members, as the One Stop Operator after:
 - (a) Considering and acting upon comments received from the public and other eligible applicants for services;
 - (b) Negotiating a Memorandum of Understanding (MOU) with all required One Stop Partners and the entity(ies) being designated to provide services consistent with the scope and intent of WIA §134 of the WIA; or
 - (c) If the local Workforce Investment Board has reached an impasse in the negotiations with any required partner, submitting a request to the Governor for intervention; after considering comments from the public and any other interested eligible applicants in the local area;
 - (4) The designation of a consortium as a One Stop Operator will not preclude the local Workforce Investment Board from designating or certifying other entities as One Stop Operators for other center(s), provided that is consistent with the MOU negotiated with the partner organizations; and
 - (5) The local Workforce Investment Board will enter into an agreement with the consortium specifying the role of the Operator and its responsibilities under the WIA, including its adherence to the MOU with the partner organizations.
- C. The Governor will approve a request to “grandfather” an existing system under the following conditions:
 - (1) A request for certification has been submitted by an entity or consortium of entities who were certified to operate an Idaho Works Career Center prior to August 7, 1998, or
 - (2) In those cases where an entity within the consortium is precluded from participation or is no longer available to provide One Stop services, the remaining members of the existing consortium have submitted such a request;
 - (3) The local Workforce Investment Board and the local elected officials have publicly announced their intent to designate the existing entity as the One Stop Operator, and for a period of no less than thirty (30) days, have provided the public and other eligible entities in the local area an opportunity to comment on the designation;
 - (4) The local Workforce Investment Board and the local elected officials have agreed to designate the entity as the Operator after:
 - (a) Considering and acting upon comments received from the public and other eligible applicants for services;

- (b) Negotiating an MOU with all required One Stop Partners and the entity(ies) being designated to provide services consistent with the scope and intent of WIA §134 of the WIA; or
 - (c) If the local Workforce Investment Board has reached an impasse in the negotiations with any required partner, submitting a request to the Governor for intervention; and
 - (d) The local Workforce Investment Board and the local elected officials have submitted such request, together with any comments received and a summary of action taken on those comments, to the Workforce Development Council. The Workforce Development Council will make a recommendation on the request to the Governor.
2. *Procedures to resolve impasse situations at the local level in developing memoranda of understanding (MOUs) to ensure full participation of all required partners in the One-Stop delivery system;*

The following procedures for resolving an impasse between a local Workforce Investment Board and the local One Stop Partner shall be employed:

The local Workforce Investment Board and the local One Stop Partner will attempt to resolve their differences by informal means before employing the formal resolution process.

- a. The Local Workforce Investment Board and local partner will document their efforts at negotiation and request the assistance of the appropriate state agency(ies) in an effort to resolve the impasse situation.
- b. The state agency(ies) may contact their federal partners for assistance upon the agreement of all parties involved.

If negotiations cannot be resumed successfully through this negotiation process, the parties to the negotiation will present the issue to the Workforce Development Council, which will attempt to mediate the dispute and assist the parties in arriving at a resolution.

If the Council is able to negotiate a successful resolution, the Council will report the results to the Governor and the responsible state agency(ies).

If the Workforce Development Council is unable to facilitate a successful resolution to the impasse, the parties to the agreement will notify the Governor, the Department of Labor and the state agency responsible for administering the partner's program.

The responsible state agencies will report the situation to the Secretary of Labor and the head of any other Federal agency with responsibility for oversight of a partner's program.

Sanctions will be imposed on the board and/or the partner program as specified in section 662.310 of the regulations.

3. *Criteria by which the State will determine if local Boards can run programs in-house;*

In accordance with Council policy, the six former IdahoWorks Boards and their staff were prohibited from serving as one stop operators and from delivering core, intensive and training services.

Local Idaho Works Boards may not provide training services without a waiver from the Governor.

The Governor will apply the statutory limitations on the provision of training services by local boards identified in WIA§117(f) without additional state criteria and will approve waiver requests if:

1. the waiver request substantiates the absence of other alternatives for providing the proposed training;
 2. the local board meets the State's criteria for being considered an eligible provider of training services;
 3. the proposed training program is for an occupation in demand locally; and
 4. no compelling evidence is received during the public review required in WIA §117 that the waiver request should not be approved.
4. *Performance information that on-the-job training and customized training providers must provide;*

The State will not establish additional performance requirements for customized training and on-the-job training activities, nor will the State establish any exemptions for customized training and on-the job training. Service providers involved in these activities will collect the demographics, participation, exit and follow-up data in the same manner as required for all other WIA activities and will be accountable to the WIA performance measures.

5. *Reallocation policies*

It is the State's policy to recapture from local areas, all unexpended Youth and Adult program funds after the second year and the unobligated amount that exceeds 25% of funds allocated during the immediately preceding year (along with the corresponding 10% administrative funds), with adjustments for any allowable transfer between funding streams. Reallocations will be made to areas that have expended 100% of the prior (year two) year's allocation and exceeded the 75% obligational requirement for the year one funding. Reallocations will be made to each eligible local area, with the amount based on the relative amount allocated to such area for that funding stream for the prior program year, as compared to the total amount allocated to all eligible local areas in the state.

It is the State's policy to recapture 100% of all unexpended State 15% funds, and 25% Dislocated Worker discretionary program funds that were allocated to the local area, along with the corresponding 10% administrative funds, for the preceding year at closeout.

6. *State policies for approving local requests for authority to transfer funds (not to exceed 20%) between the Adult and Dislocated Worker funding streams at the local level;*

The Governor will approve plans from a local board to transfer up to 20% of a program year's allocation between the adult and dislocated worker programs.

7. *Policies related to displaced homemakers, nontraditional training for low-income individuals, older workers, low-income individuals, disabled individuals and others with multiple barriers to employment and training;*

Idaho's service delivery model is one which identifies individuals in core services who possess barriers to employment, including those with multiple barriers, and requires referral to appropriate programs for further assessment and service as appropriate. As indicated below, special consideration is given to a number of groups identified as possessing special barriers.

While no additional barrier groups have been identified at the state level for WIA services, all applicants for WIA services are required to receive an appropriate service or a value added referral to an appropriate service provider in the community. WIA continues the practice of providing service to those most in need who can benefit, which will give priority to those qualified individuals with multiple barriers.

Since the implementation of WIA, Idaho's Workforce Development Council has included "displaced homemakers" as an eligibility group qualified to receive dislocated worker core, intensive and training services on a statewide basis.

The Council has earmarked State 15% funds for the State's Area Agency on Aging to assist adult providers with intake and case management processes as well as coordination of services with other older worker programs, to ensure meaningful and successful delivery of services to older workers.

Persons with disabilities are given special consideration for labor exchange services and are treated as a family of one in determining income for WIA, giving them an additional opportunity for participation in intensive and training services. State policy requires that all partner programs provide services in the one stop centers in a manner that meets requirements of section 188 affording programmatic and physical access to services. Incentive grant funds were used to provide special disability workstations in all Commerce and Labor one stop and affiliate locations, ensuring that those with multiple disabilities could access the wide range of on-line services. The WIA portal on the Commerce and Labor Home Page provides technical assistance resources to assist our workforce professionals in providing services to persons with disabilities.

Local boards were given the opportunity to analyze the customer need in relation to resource availability, in order to determine whether there are sufficient funds available in the local area to serve all adults appropriate for intensive and training services. The state has determined that sufficient TAFI (TANF) funds exist statewide to serve public assistance recipients. Local areas are relieved of the requirement of providing priority to this population. Unless adequate demonstration is provided by local boards that sufficient funds are available in the local area to serve all appropriate adults, local boards will be required to describe in their plans the procedures that will be used to ensure that priority for intensive and training services is given to low income groups other than public assistance recipients.

All local plans identify demographic groups' incidence of the population in their labor markets and delineate specific activities to ensure access to all services. Unique

service levels and activities are reflected in service provider agreements. Idaho's workforce system, its advances in automation and plans to increase the partners and locations of One Stops, brings greater accessibility to all potential customers particularly those with multiple barriers.

8. *If you did not delegate this responsibility to local boards, provide your State's definition regarding the sixth youth eligibility criterion at section 101(13)(C)(iv) ("an individual who requires additional assistance to complete an educational program, or to secure and hold employment"). (§§ 112(b)(18)(A) and 20 CFR 664.210).*

The State, through the Workforce Development Council, has defined this criterion for use by all providers throughout the state in PY'06. It is included in Section VI, Major State Policies, Part F, Page 73, as part of the state's first modification to this plan. Prior to this, the state had delegated this responsibility to Local Boards. who have defined "an individual who requires additional assistance to complete an educational program or to secure and hold employment". The local definitions will be used for PY'05 and will be re-examined by the Workforce Development Council for PY'06.

IX. *Service Delivery*

Describe the approaches the State will use to provide direction and support to local Boards and the One-Stop Career Center delivery system on the strategic priorities to guide investments, structure business engagement, and inform service delivery approaches for all customers. (§112(b)(17)(A).) Activities could include:

A. *One-Stop Service Delivery Strategies: (§§112(b)(2) and 111(d)(2).)*

1. *How will the services provided by each of the required and optional One-Stop partners be coordinated and made available through the One-Stop system? (§112(b)(8)(A).)*

State partners have entered into a cooperative agreement to assist the local service delivery system in the delivery of coordinated services. Each of these entities also identified their “applicable core services” and identified their “preferred” method of service delivery. These are included as Attachments 14 and 15. The purpose of these documents was to identify for the IdahoWork Boards and local counterparts the minimum level of services that could be expected in the One Stop system from partner organizations.

The remaining partners listed at WIA §121 have participated via the local IWBs and the more informal planning committees established by those boards. Native American grantees, Job Corps, HUD and VR client advocacy programs are required to sit on local boards in areas where they have a physical presence and enter into MOUs articulating how they will offer their applicable core services in the One Stop system in a manner that is consistent with state policy. During PY’05, the state will explore options for renegotiating MOUs with these partner groups.

While state programs funded by the USDOL have agreed to a physical presence in the One Stop Centers, the preferred methodology selected by most partners is an electronic rather than a physical presence. State policy requires those identified as mandatory partners in WIA §121 to offer their services via a physical presence in the Center if all of their applicable core services cannot be delivered electronically or if it is required to meet the non-discrimination provisions of WIA §188. Each of these partners has been encouraged and is expected to continue offering services via the affiliate network so that this expansive information and referral network can carry forward. The *Idaho Works* home page discussed throughout this plan is the mechanism that will be used to provide eligibility, program and referral information for all partner programs in the One Stop system. The MOUs developed in each workforce area describe the specific processes for referring customers among partner programs.

A summary by organization follows.

- Department of Commerce and Labor – The Idaho Department of Commerce and Labor has fully committed to the development of the One Stop system in Idaho and will offer all of its programs through the system. These include Wagner-Peyser, Unemployment Insurance, Trade Adjustment Assistance, Jobs for Veterans (formerly LVER/DVOP) and employment and training assistance, and a host of cost reimbursable grants including WOTC and W2W Tax Credits, LMI, H2A, and other special grants as well as a state funded training program.

The WIA Title I funding stream is also under the administrative arm of the Idaho Commerce and Labor and the local offices are recipients of WIA funds in the local area. The Idaho Commerce and Labor has been named as the One Stop Operator as a sole provider or as part of a consortium of operators in all six workforce regions.

Five Commerce and Labor offices in Idaho's major cities have served as the State's One Stop Centers, while the remaining nineteen offices have served as Affiliate sites offering the full range of USDOL funded services. The Governor is proposing that all remaining Idaho Commerce and Labor offices be transformed into full service Centers during PY'2005.

An extremely successful partnership was developed with senior programs operated by the Idaho Commission on Aging and WIA programs. The Department of Labor, Idaho Commission on Aging and local Private Industry Councils took the lead in expanding partnerships and in moving towards greater co-location of staff. These relationships continued under the WIA, largely as a result of advocacy and nurturing by the Commission on Aging.

The Department of Commerce and Labor has utilized Wagner-Peyser funds to operate the state's primary labor exchange for a number of years. While partners often do their own job development, the Wagner-Peyser Employment Service System has been a referral point for all work ready participants about to exit program services. One Stop funds were used to make job registration and job listing services more accessible to partners and their clients. Now, customers can utilize this service at any partner location or over the Internet. This assures broad use of the system by all partners and eliminates the need to create alternative systems. The labor exchange self-registration and job search systems are being made available to all partners and will not be duplicated.

- Department of Health and Welfare – This agency oversees a wide range of programs geared towards assisting families achieve self-sufficiency. While only the CDBG program is mandatory, the DHW plans to provide access to information about its other services offered under TANF, Food Stamps E&T and the Child Care Assistance program. Information and applications for services will be available via the Idaho Works Home Page. Brochures will also be made available.
- State Superintendent of Public Instruction – The Department of Education oversees the State's ABE program. Services are generally contracted to the States six postsecondary schools and community colleges. The ABE program will entertain a wide range of options for delivering ABE through the One Stop system. ABE will also make the Idaho Works System available to their customers and have incorporated a curriculum that includes training students on the use of the system to find work and job training assistance.
- Division of Professional-Technical Education – The Division has been a long time partner with Department of Commerce and Labor workforce programs. In Idaho, the Carl Perkins funds are typically not used to fund programs and are therefore not subject to participation requirements for required partners in the One Stop system. However, the Division and local education institutions are continuing to participate in joint efforts at both the state and local levels. Local educational institutions will serve as host sites for the Idaho Works system to bring information and services to the campus. Naturally, we expect the public education system to remain a primary provider of education services in the state.
- Division of Vocational Rehabilitation – The Division has indicated its preference for delivering services in an electronic format in the One Stop Centers and has pledged

to make personal services available on a scheduled basis if that is preferred by the customers. They intend to develop an electronic application form for those seeking services. The Division also has Idaho Works computers available for customers who will access services at its primary location. State and local staffs have participated in One Stop system design efforts and will continue to do so under the WIA. The Division has offered to provide partner agencies information on ADA and assist in addressing accommodation issues.

- Idaho Commission for the Blind and Visually Impaired – The ICBVI also has indicated a preference for an electronic presence in the One Stop Centers and has committed to make staff available in the Center on an appointment basis to meet a customer request. The ICBVI frequently takes its services to its customers. They have pledged to make the Idaho Works system available to customers and to assist them with its use during visitations. The ICBVI has been a long time One Stop partner and has been very helpful in assuring that the Internet Idaho Works version is capable of being read by “voice”.
- Idaho Migrant Council – The IMC, the recipient of the Title I MSFW grant, is the only private non-profit serving on the state partners’ group. As indicated on the charts, the IMC has entertained a wide range of options for coordinating services in the One Stop Centers. The IMC has also pledged to serve as an Affiliate site, bringing the services on the Idaho Works system to its MSFW customers.
- Local level programs – Native American Programs are sovereign entities that negotiate independently of each other when determining their role in the WIA. Client Assistance Programs, HUD employment and Training and Job Corps services are offered at the local level and do not have a state level presence. These programs are represented on IWBs and One Stop committees or planning groups in the locales where they have a physical presence. Their level of participation will be determined by the MOU but must meet state standards for required partners. Other voluntary organizations participate locally at the option of the IWB/LEO partnership. Because the participation of these entities is negotiated locally, their core services have not been included in Attachments 14 and 15.

2. *How are youth formula programs funded under (§128(b)(2)(A).) integrated in the One-Stop system?*

WIA youth services are delivered through the one stop system, with all ten elements often provided by the One Stop Operator consortia. Access to services for youth providers outside the one stop center is made available by including a list of youth providers on the WIA portal that is linked to the description of youth services available in the state. Youth providers and one stop operators are well aware of the service offerings of their partner organizations. Routine referrals are made between providers of these services and co-enrollments between one stop and other youth service providers are not uncommon.

3. *What minimum service delivery requirements does the State mandate in a comprehensive One-Stop Centers or an affiliate site?*

The minimum service requirements are contained in the State’s One Stop Policy included as Attachment 6 and articulated in Section VI.C. and Section VIII H. of this plan.

4. *What tools and products has the State developed to support service delivery in all One-Stop Centers Statewide?*
 - a. Due to the large geographic size of the State and its rural nature, Idaho has continued to develop the *IdahoWorks* internet system as a major tool in its efforts to support service delivery through the One Stop Centers. Technology is providing an increasing portfolio of customer services, including a new labor market information website, internet wage reporting and UI tax filing, and multiple options for listing job orders and receiving job applications. Internet web sites are providing redesigned labor market and economic development information for business and job seeker needs. Electronic job search available through the *IdahoWorks* system is making business needs visible to many more qualified applicants. Technology is providing more self-service options, freeing staff time to offer customized service to business and job seekers.
 - b. Major initiatives in staff training provide One Stop office staff with the opportunity to obtain national certification as Career Development Facilitators. Aspiring managers are offered access to management development training leading to becoming Certified Public Managers. As part of a major Business Relations Initiative, a training package for all One Stop staff has been developed on various aspects of marketing One Stop services to business. Staff training is also planned in the full range of economic and community development services to ensure capacity of local one stop staff to connect business customers to these services.
 - c. Idaho's newly designed Labor Market Information (iLMI) website helps businesses make decisions applying a variety of data such as availability of skilled workers, pay and benefits by occupations, economic profile of the state and counties, area demographics, industry growth and composition, and number of workers by occupation. iLMI also offers job seekers online tools to format and save their own customized labor market data using local, regional, state or national information. Customers and partners are using new customer feedback processes to drive future website updates.
 - d. The IdahoWorks brand is used for statewide marketing of the system. Logos, brochures and websites have been developed to inform citizens of the wide array of services available through Idaho's workforce, economic development and education service providers.
 - e. A combination of state and federal funds have been used to upgrade facilities statewide to ensure that all planned Idaho Commerce and Labor one stop facilities are accessible to a universal population of individuals and businesses. These facilities are professional in appearance, include a wide range of workforce, economic development and education materials made available by state agencies and have specialized facilities for workshops and business recruitment.
5. *What models/templates/approaches does the State recommend and/or mandate for service delivery in the One-Stop Centers? For example, do all One-Stop Centers have a uniform method of organizing their service delivery to business customers? Is there a common individual assessment process utilized in every One-Stop Center? Are all One-Stop Centers required to have a resource center that is open to anyone?*

The one stop policy framework describes how services will be offered, what services must be offered and how services must be made available. The following can be found at any one stop center across the state.

- All one stop centers have electronic lobbies with access to the full array of services on IdahoWorks and partner websites.
- All centers are fully accessible and include computers that can be adapted to a variety of disabilities, resources in English and Spanish with access to interpreters where needed, TTY lines and services for both individuals and businesses.
- All one stop centers are staffed by highly qualified individuals who have been certified as Career Development Facilitators.
- All one stop centers have resource rooms targeted to individual and business customers.
- The centers have relied on the array of assessment instruments recommended by Idaho Commerce and Labor to assess customer needs.
- All centers are either new or remodeled and offer a highly professional appearance pleasing to both individual and business customers.

Even with this standardization, a key feature of the system is that services are tailored to the communities where they are placed and the individuals and businesses they serve. This is accomplished through the participation of center managers and staff in their local chambers, economic development groups, and education and community organizations serving special populations. Each center also maintains a business advisory group to provide employer identified education services and advice on service offerings within the center.

B. *Workforce Information – A fundamental component of a demand-driven workforce investment system is the integration and application of the best available State and local workforce information including, but not limited to, economic data, labor market information, census data, private sources of workforce information produced by trade associations and others, educational data, job vacancy surveys, transactional data from job boards, and information obtained directly from businesses. (§§111(d)(8), 112(b)(1), and 134(d)(2)(E).)*

1. *Describe how the State will integrate workforce information into its planning and decision making at the State and local level, including State and local Boards, One-Stop operations, and case manager guidance.*

Idaho Commerce and Labor's Communications and Research Division provides a central location for labor market information (LMI) that is used by One-Stop Business Centers as well as other economic development organizations, educational institutions, government agencies, etc.

The State of Idaho provides a comprehensive labor market information (LMI) system for the state. The Department of Commerce and Labor, Idaho SOICC, Division of Financial Management, Division of Professional-Technical Education, Department of Education, and the State Board of Higher Education are the primary producers of LMI products and services.

Idaho participates in all of the BLS Federal/State Cooperative Agreement statistical programs. ETA One-Stop funds have been used to create LMI delivery systems through traditional printed materials, customer computerized self-service stations in One-Stop Centers and Affiliates, the Internet, and participation in national efforts such as America's Job Bank and Career Network. The state's Census Data Center has Affiliate centers in the state's universities. The Division of Financial Management

prepares annual economic projections, as does the Department of Commerce and Labor.

The LMI includes data developed by the Idaho Department of Commerce and Labor, Communications and Research Division, in cooperation with the BLS, U.S. Bureau of the Census, Bureau of Economic Analysis, and data from any other source that would provide information on Idaho's labor market. The data is compiled and made available to its many users.

The Department has six Regional Labor Market Economists stationed in the major cities. These analysts meet regularly with local employers, schools, economic development agencies, and government officials.

The Department of Commerce and Labor has developed, in a consortium with twenty-one other states, a computerized system for the delivery of employment statistics: *iLMI*. This application runs on the ALMIS Database and is delivered via client-server connectivity to all Idaho Works (One-Stop) customer service stations. It also serves as a data warehouse for service staff, analysts, and program planners.

The usage numbers attest to the popularity of *iLMI*:

<i>iLMI USE - PY03</i>		
Month	Visits	Hits
July 03	6,707	63,566
Aug 03	5,516	85,339
Sept 03	7,193	182,727
Oct 03	8,055	18,020
Nov 03	9,874	83,000
Dec 03	9,802	77,292
Jan 04	12,441	113,655
Feb 04	11,205	106,379
Mar 04	13,167	141,584
Apr 04	11,886	109,623
May 04	11,238	104,282
June 04	10,441	99,359
Total	PY	
2003	117,525	1,184,826

Data produced in Idaho's economic statistics system usually includes county specific information. However, sparse populations and disclosure limitations often affect the level of detail that can be delivered at this geographic level. Idaho continues to survey employers to seek permission to disclose identifying information and employers with about 60 percent of the state's employment have provided this permission.

2. *Describe the approach the State will use to disseminate accurate and timely workforce information to businesses, job seekers, and employment counselors, in easy to use formats that are readily accessible within One-Stop Career Centers and at remote locations such as libraries, schools, worksites, and at home.*

The variety of LMI customers knows no limit. We know that our customers include people both from the public and the private sectors, students, job seekers, and the media. They are the Legislature, schools, CIS, planners, employers, job seekers, and all other end users. Local government agencies, politicians, and the media are some of the most frequent repeat customers of LMI.

Idaho Commerce and Labor's Communications and Research Division's LMI website has been very well received by the Department and other customers. Feedback provided by customers has indicated support for data provided both on the website and via e-mail as well as the variety of data available. The Communications and Research Division will continue to utilize the *iLMI* technology to expand the scope of available labor market information. Idaho continues to aggressively pursue the use of electronic and digital media to more efficiently and effectively publish and disseminate LMI.

Prior to this planning cycle, the LMI team periodically met with each, then-existing, Workforce Investment Board and other data users to discuss their workforce information needs. Each Board ranked the data elements by importance to their organization. Other data users, especially economic development groups, also frequently request these same data items. The data items are ranked in order of importance. Besides assuring available data is accessible via the Internet or other means, some new ways of packaging the information have been developed. A new *Labor Assessment Survey* product has been designed and will be implemented during the next two years. An outline of the *Labor Assessment Survey* follows. The Department will involve the colleges and universities in the state with designing and conducting surveys to obtain area specific data that is comparable from region to region.

Labor Assessment Survey product

PURPOSE

The purpose of a labor assessment survey is to fill the data gaps in the labor market information that is requested by the One-Stop Business Centers and economic development groups. A survey will be designed to obtain information. The Department will collaborate with colleges/universities and other partners across the state in the process.

LABOR ASSESSMENT SURVEY TEMPLATE	
LABOR FORCE DEMOGRAPHICS	<ul style="list-style-type: none"> Growth or decline Unemployment rate Ability to recruit Not in the labor force Underemployment Multiple job holders Retired Demand
LABOR FORCE QUALITY	<ul style="list-style-type: none"> Age Educational attainment Skills <ul style="list-style-type: none"> Basic Computer/technological Work ethic/productivity Absenteeism Turnover
LABOR FORCE TRAINING	<ul style="list-style-type: none"> Quality of schools <ul style="list-style-type: none"> High schools Prof/tech programs Technical/short term skills training availability Colleges and universities
LABOR FORCE COST	<ul style="list-style-type: none"> Average earnings Average wages by occupation Average wage by industry Benefits
LABOR FORCE ASSESSMENT	<ul style="list-style-type: none"> Conclusions Strengths Weaknesses

The LMI team works closely with the six Regional Labor Economists (RLEs). The RLEs attend and contribute to their region's local business interest (such as Chambers of Commerce) and economic development groups. During these meetings they gain insight into ways to best serve the LMI needs of their regions and the customers they serve. An RLE is often a key resource member of an economic development team preparing a location study for a prospective employer. Via these relationships with the community they serve, the RLEs obtain a myriad of requests from employers and workforce intermediaries, such as labor exchange agents, schools, community-based organizations, career guidance counselors, and teachers.

3. *Describe how the State's Workforce Information Core Products and Services Plan is aligned with the WIA State Plan to ensure that the investments in core products and services support the State's overall strategic direction for workforce investment.*

In the Department's efforts to provide continual, periodic, and ad hoc data to information users, we have gained immense feedback from the users via the customer satisfaction and evaluation component of the Workforce Information Plan and continually refine the data scope and style of presentation accordingly. The Communications and Research Division will continue to immediately respond to these requests in order to disseminate timely and accurate research to customers and stakeholders.

The Communications and Research Division will continue to complete all core deliverables while also fulfilling the typical ad-hoc demands that occur in our growing and dynamic economy.

- ❖ Idaho's America's Labor Market Information System (ALMIS) database (v2.2) is accessed via Idaho's LMI internet delivery system (iLMI). Idaho's ALMIS database is populated with tables required by the ALMIS workgroup, and is updated throughout the year with weekly, monthly, and quarterly data as it becomes available. All core tables are uploaded and continue to be current. The Department will develop short-term substate projections, economic indicator series, and a myriad of ancillary data sources currently not populated. The recent Commerce and Labor merger will allow workforce information professionals to incorporate commerce and business related data within the ALMIS infrastructure creating powerful data leveraging opportunities.
- ❖ Using methodology, software, and guidelines from Projections Workgroup & Projections Managing Partnership, Idaho will develop Industry and Occupational Projections defined below:
 - ~ Idaho state long-term 2004-2014 (biannual) industry and occupational employment projections
 - ~ Substate long-term 2004-2014 (biannual) industry and occupational employment projections
 - ~ Idaho state short-term 2005-2007 (annual) industry and occupational employment projections
 - ~ Substate short-term 2005-2007 (annual) occupational employment projections

~ Data for public dissemination pursuant to Projections Workgroup & Projections Managing Partnership procedures and associated applications will be submitted to federal partners and published and disseminated to Idaho's customers and stakeholders

❖ Idaho will also produce various occupational and career information products for public use.

~ Occupation and Employment Statistics wage publication at the state and substate level, and Standard Occupational Classification glossary publications

~ Fringe Benefit survey, data, and publication

~ *Education and Training Pay!* poster and suite that incorporates projections, wage and skills data

~ Occupational and Industry Projections publication to disseminate a wide array of state and substate projections and wage data in various formats such as fastest growing and highest demand occupations

~ Provide employer databases, Idaho's own employer database and the licensed *InfoUSA* employer database.

❖ Idaho will also coalesce wage, projections, and cluster data with the new skills based employment system in order to quantify skills gaps. Also, partnerships via the Policy Academy are being built with legislators, educators, business, government officials and other stakeholders to better quantify the supply side when determining and evaluating potential skills gaps. Most notably a recent collaboration with professional-technical officials has allowed the Department to fully integrate projections data by occupation to professional-technical institutions throughout the state to identify existing programs that fulfill the educational requirements for growing critical occupations. The first effort to develop partnerships has been successful in providing cluster data via wage, projections, and skills data. We are now using this valuable collaboration to use the improved supply side information to better identify and quantify skills gaps.

The Communications and Research Division will continue to expand uses of the Local Employment Dynamics (LED) program to respond to the need for labor, economic, and demographic data at the community level. Idaho Commerce and Labor has been selected as a pilot state for the LED mapping application tool. Organizationally, Idaho offers an integrated structure among economic development, labor market information, census entities, and data users. The mapping application will bring a new planning and analytical tool to the state. It will help a variety of entities that are faced with the challenges of improving the economic viability of their communities. The mapping tool, along with the comprehensive socio-economic, geographic-based database that will be enhanced by the *Labor Assessment Survey*, will be an enhanced data tool for local economic development officials.

As each data element becomes available, analysis and/or format will be added so that data actually becomes Labor Market Information. Both the data and information will be available in a variety of media – on the website, in a tangible paper format, or some other type of media such as a CD. Another avenue of data distribution includes

e-mail rather than U.S. mail, thus reducing printing and postage costs. In addition, e-mail groups could be set up to let users know that a particular piece of labor market information has been released or updated. E-mail currently is used to distribute press releases on the monthly unemployment rate, economic developments (i.e., latest population estimates), significant events (i.e., major layoffs and Rapid Response efforts), UI tax and benefit changes, and items of general interest. Yet, the most effective media still remains the in-person discussion between the data provider and the data user.

The monthly newsletter *Idaho Employment* summarizes employment/unemployment developments for the state and the six areas. Employment data tables are a regular feature. A *FYI* section presents articles and data on a wide variety of employment-related topics. Recent issues have included information about:

- Skills – what employers are looking for (soft and technical)
- Projections - occupation & industry employment – a mandated deliverable
- Labor force demographics – age, gender, race/ethnic
- Wages by occupation– a mandated deliverable
- Underemployment – wage, hours, and education

Approximately 2,000 newsletters are distributed monthly and it is on the Internet.

One-Stop LMI Grant funds also will be used to send staff to the LMI Forum, LMI Analyst Training, WIA LMI Conference, and other ALMIS related training. The RLEs provide the LMI module in the Career Development Facilitator (CDF) program to interested Idaho Commerce and Labor staff. The half-day training was delivered across the state. Anticipated additional CDF/LMI training will be provided in 2005 for new staff and/or as a follow-up to the initial presentations.

The Department will also conduct a statewide LMI Economic Symposium in 2005 to further highlight and disseminate core LMI products. This effort will improve outreach to those customers and stakeholders on the periphery. Also, this effort will partner with the Director's Forum to attract business and legislative stakeholders that have extensive leverage in Idaho's economy. It is vital that LMI is diffused throughout our economic landscape.

4. *Describe how State workforce information products and tools are coordinated with the national electronic workforce information tools including America's Career Information Network and Career Voyages.*

Idaho will continue to participate in the national electronic workforce information system by providing data, job listings, and other information required by it. The One-Stop Business Centers and partners will provide access to these tools via computer workstations in the facilities, "how to use" materials for customers, and staff training on the tools' contents and operations.

C. *Adults and Dislocated Workers*

1. *Core Services. (§112(b)(17)(a)(i).)*

- a. *Describe State strategies and policies to ensure adults and dislocated workers have universal access to the minimum required core services as described in §134(d)(2).*

The Workforce Development Council and all workforce partners across the state will continue to refine Idaho's One Stop system to meet the needs of customers in all of Idaho's communities and from all population groups by offering customer choice to online or in person access to an increasing level

of information and comprehensive service delivery. Section VI.C. of this plan describes how customers access services, the comprehensiveness of those services and guidelines for delivery of services.

Adult and dislocated worker customers, including those with special needs, will have access to employment and training services delivered in progressively higher stages of intervention from core, intensive and training, as appropriate, to meet their individual needs. A description of core, intensive and training services to be provided with allotments received under WIA §132 is attached as Attachment 5.

- b. *Describe how the State will ensure the three-tiered service delivery strategy for labor exchange services for job seekers and employers authorized by the Wagner-Peyser Act include (1) self-service, (2) facilitated self-help service, and (3) staff-assisted service, and are accessible and available to all customers at the local level.*

Wagner-Peyser labor exchange services will be delivered as part of the One Stop system in the Centers, Affiliate sites and via Direct Access through the electronic Idaho Works. Idaho Works will provide job seekers, employers and students self-service access to all local, state, and national job listings, labor market information, career information, registration for work and other services that are available through the One Stop system for their respective needs. As described previously, Idaho Works will be available via the Internet, throughout the participating Centers and Affiliate sites. Other labor exchange materials for self-service will be made available in Employment Resource Centers in each of the Commerce and Labor offices to assist customers in obtaining employment or training services that may include but are not limited to career exploration, LMI, resume writing, fax machines, copy machines, and job search techniques.

Facilitated self help will be made available to any customers who request help or for those with special needs due to disabilities, limited language or reading skills. Utilizing the electronic capabilities of the Department's labor exchange system, Commerce and Labor and Partner staff can identify priority or other targeted populations who are registering for work and offer facilitated self help or additional staff assisted services. ES priority populations would include veterans and migrant and seasonal farmworkers while other locally targeted populations may include those with disabilities, unemployment insurance claimants, members of low income families, public assistance recipients, dislocated workers, displaced homemakers, minorities, youth, or other groups targeted by the local area..

Staff assisted services will be available in all Commerce and Labor offices for those customers who request or require such services to obtain basic labor exchange services concerning labor market or career information, registering for work and job referrals. Staff assistance will also be provided to customers for other staff assisted services as vocational guidance, resume writing, and referral to other One Stop Partners for services to meet their individual needs.

- c. *Describe how the State will integrate resources provided under the Wagner-Peyser Act and WIA Title I for adults and dislocated workers as well as resources provided by required One-Stop partner programs, to deliver core services.*

As the state moves toward a single area system the state is proposing that all Commerce and Labor offices become full service one stop centers

offering a full range of WIA Title IB and Wagner-Peyser services. During PY'05, the State will renegotiate MOUs with the Workforce Development Council. This will provide an opportunity to re-examine the existing system to determine whether further integration is appropriate. In PY'05, the state will rely on existing MOUs negotiated on a regional level. In all one stop offices housed in Commerce and Labor offices, Wagner-Peyser will continue to be the predominant provider of core services with its extensive automated network and reach of services. All Wagner-Peyser services will be provided by public merit staff employees of the Idaho Department of Commerce and Labor.

2. *Intensive Services. (§112(b)(17)(a)(i).) Describe State strategies and policies to ensure adults and dislocated workers who meet the criteria in §134(d)(3)(A) receive intensive services as defined.*

The three-tiered approach service design, which ensures delivery of intensive services when needed, is reinforced with Idaho's collaborative workforce and education partnerships at the state and local level. Idaho's WIA career counseling staff training is built upon the individual's natural progression through core, intensive and training. The statewide WIA MIS and assessment forms which require documentation of work history, skill sets, barriers to work, training and work goals, also require the case manager to specifically identify the intensive services delivered or coordinated via partners to meet barriers/needs of the client identified at intake or at any time while in the program. As frontline staff complete the process of one-on-one career guidance, applying labor market information with the individual's skill sets, and identifying possible options for self-sustaining employment, the forms and the MIS, as well as the case manager's knowledge of intensive service offerings, ensures delivery of appropriate intensive services and the documentation is a natural progression.

Intensive Services are intended to identify obstacles and provide a higher degree of intervention to assist eligible unemployed adults and dislocated workers who are determined unable to obtain or retain employment through core services. Intensive services may also be provided to employed workers to obtain or retain employment that will lead to self-sufficiency as defined by State policy. Attachment 5 reflects the state's definition of intensive services.

3. *Training Services. (§112(b)(17)(A)(i).)*

Training Services includes classroom and other occupational training services designed to equip eligible adults and dislocated workers to enter the workforce and/or retain employment. Training services may be made available to employed and unemployed adults and dislocated workers who:

- a) Have met the eligibility requirements for intensive services, have received at least one intensive service, and have been determined to be unable to obtain or retain employment through such services;
- b) After an interview, evaluation, or assessment, and case management, have been determined by a One Stop operator or One Stop partner, to be in need of training services and to have the skills and qualifications to successfully complete the selected training program;
- c) Select a program of training services that is directly linked to the employment opportunities either in the local area or in another area to which the individual is willing to relocate;
- d) Are unable to obtain grant assistance from other sources to pay the costs of such training, including Federal Pell Grants established under title IV of the Higher

- Education Act of 1965, or require WIA assistance in addition to other sources of grant assistance, including Federal Pell Grants; and
- e) For individuals whose services are provided through the adult funding stream, and determined eligible in accordance with the State and local priority system;

Permissible Local Employment and Training Activities Adult and dislocated worker funds provided to local areas may also be used to deliver the discretionary activities identified below and authorized in the Act:

- a) Customized screening and referral of qualified participants in training services to employment;
 - b) Customized employment-related services to employers on a fee-for-service basis that are in addition to labor exchange services available to employers under the Wagner-Peyser Act.
- a. *Describe the Governor's vision for increasing training access and opportunities for individuals including the investment of WIA Title I funds and the leveraging of other funds and resources.*

As the six regional areas are consolidated into a new single statewide area structure, the state will reduce overhead from 14 percent to less than 3 percent, a reduction of more than \$1.3 million now spent to support the six-region structure. This efficiency maximizes the available money directed to training and services to business and job seekers in the face of the severe federal budget cuts experienced by the state in the last four years. The State has set a goal of spending 50% of WIA Title I B adult and dislocated worker local funds for direct training and support of businesses and participants.

- b. *Individual Training Accounts:*
- i. *What policy direction has the State provided for ITAs?*

The Individual Training Account (ITA) is established on behalf of a participant. All ITAs must be selected by the participant and approved by their WIA case manager. ITAs will focus on training in high growth industries while maximizing customer choice. ITAs will be issued for a specific training program and to a specific provider. ITAs may not be transferred from one participant to another. All training must be linked to employment opportunities in the area or to another area where the individual is willing to relocate. Training services may only be made available in accordance with federal and State policies on moving from core/intensive services to training.

ITAs must be coordinated with other grant sources for training, including Pell Grants, in accordance with the following State policies. Section 134(d)(4)(B) limits the use of WIA funds for training services to instances when there is no or inadequate grant assistance from other sources available to pay for those costs. The statute specifically requires that funds not be used to pay for the costs of training when Pell Grant funds or grant assistance from other sources are available to pay the costs. However, Title IV of the Higher Education Act (HEA) as amended (20 USC 1087uu), prohibits taking into account either a Pell Grant or other Federal student financial assistance when determining an individual's eligibility for, or the amount of, any other Federal funding assistance program.

Thus, program operators must coordinate available training funds and make funding arrangements with entities administering alternate sources of funds, including Pell Grants, to avoid duplicate payment of costs and to ensure that WIA

funding for training is limited to participants who 1) are unable to obtain grant assistance from other sources to pay the costs of their training or 2) require assistance beyond that available under grant assistance from other sources to pay the costs of such training.

The “costs of training” is defined as the total of the education and education-related costs (training and supportive services costs) which will be incurred if the participant is to complete the chosen program. The WIA program operator will work with the participant to assess the full education and education-related costs (training and supportive services costs) and to calculate the total funding resources available. The exact mix of funds will be determined based on the availability of funding, with the goal of ensuring that the costs of the training program the participant selects are fully paid and that necessary supportive services are available so that the training can be completed successfully.

If WIA funds are initially used to cover costs of enrollment in a training program while the Pell application is pending, only the portion of the Pell Grant intended to provide tuition may be subject to reimbursement if the funds received from all funding sources exceeds the total cost of training documented by the program operator.

In an effort to maximize local service delivery options, WIA intensive services will be excluded from the Eligible Training Provider requirements. Intensive services include such activities as basic skill training, training in quality practices, basic computer software training and general preparatory services.

WIA allows training services to be provided through a contract for services in lieu of individual training accounts for the following three exemptions:

1. on-the-job training and customized training;
2. programs procured where there is an insufficient number of providers in the area to accomplish the purpose of Individual Training Accounts (ITAs); or
3. when a local board determines that there are qualified programs serving special populations with multiple barriers.

Idaho will utilize on-the-job training and customized training as allowed by federal guidance. Idaho will develop the policies for exemptions based on an insufficient number of providers during the development of the Eligible Training Provider outcome reporting system. Exemptions for qualified programs serving special populations with multiple barriers will be permitted in accordance with WIA law and regulations.

Idaho will utilize a fourth exemption for dislocated workers targeted for early intervention services organized through a Labor/Management Committee. To enhance early intervention services for dislocations, Labor/Management Committees will be allowed to organize group training projects for workers impacted by large layoffs. The projects will need to identify a sufficient number of potential participants interested in similar job skill training. The training will be related and build upon the existing skills of the workers. The training will be for occupations in demand and for a variety of potential employers. The training will be provided by Idaho’s postsecondary schools and will be in addition to regularly scheduled program offerings to maximize customer choice in selecting training options. The Dislocated Worker Unit will approve all projects.

- ii. *Describe innovative training strategies used by the State to fill skills gaps. Include in the discussion the State's effort to broaden the scope and reach of ITAs through partnerships with business, education, economic development, and industry associations and how business and industry involvement is used to drive this strategy.*

The state has directly funded 4 incumbent worker/customized training projects in the health care and construction industries. These were intended to address the lack of capacity in the education system to meet the industries' need for skilled workers. In all cases, a combination of resources from WIA, the industry and the educational entities have been brought together to sustain the training effort. ITAs are driven by individual choice following a review of labor market information. The state has broadened ITAs to include them for use in the Trade Adjustment Assistance Program.

- iii. *Discuss the State's plan for committing all or part of WIA Title I funds to training opportunities in high-growth, high-demand and economically vital occupations.*

The state will continue funding of the existing high growth projects during PY'05. Due to the severe budget cuts, it is expected that only limited new enrollments will occur during PY'05. During PY'05, the state will examine opportunities to enter into additional projects funding high growth high demand opportunities. The state has not set a limit for funding, but will continue to monitor enrollment under ITAs in selected occupational areas such as health care and high technology.

- iv. *Describe the State's policy for limiting ITAs (e.g., dollar amount or duration)*

The State will not limit Individual Training Accounts funding amounts, duration, or define allowable training costs.

- v. *Describe the State's current or planned use of WIA Title I funds for the provision of training through apprenticeship.*

The State allows WIA Title I funds to be made available for use by participants who are pursuing apprenticeship training programs. Guidance is provided to front-line staff for coordinating with the Bureau of Apprenticeship and Training when establishing training in apprenticeable occupations. The construction high growth project is part of a program recently approved by BAT.

- vi. *Identify State policies developed in response to changes to WIA regulations that permit the use of WIA Title I financial assistance to employ or train participants in religious activities when the assistance is provided indirectly (such as through an ITA) (20 CFR § 667.266(b)(1).)*

Idaho developed policy to comply with changing requirements. State program participants may now use WIA Title I financial assistance to receive training in religious activities **only** when the financial assistance is provided **indirectly** through the use of Individual Training Accounts or ITAs. This type of indirect support does not violate WIA's regulations as long as program participants are given a genuine, independent choice about where to direct their aid. Rules regarding the use of WIA Title I financial assistance for the **direct** support faith-based organizations have not changed. Direct support occurs when Title I

financial assistance is given directly to a faith-based organization by a WIA grantee.

Faith-based training providers seeking to offer their training services to participants under WIA must adhere to all other program requirements. This includes applying for admission to the State's Eligible Training Provider (ETP) list. The state Workforce Development Council, or its designee, will continue to make the determination on whether a proposed course of study is appropriate for placement on the State's ETP list.

- c. *Eligible Training Provider List. Describe the State's process for providing broad customer access to the statewide list of eligible training providers and their performance information including at every One-Stop Career Center. (§112(b)(17)(A)(iii).)*

The Eligible Training Provider List will be available through the IdahoWorks home page. This website serves as a gateway to the major education, employment and training service systems in the State. It links to the home pages of a variety of state agency partners to provide information to job/training seekers and employers about the variety of services available in the Idaho workforce development system. This process ensures that customers and other states will have access to the list through the Internet. As outcome data is developed, it will be added to this website.

When consistent and verifiable outcome information is produced through the Eligible Training Provider system, this information will be made available in the One Stop Centers through this automated system. All One Stop Centers and affiliate sites have staff available to assist customers who either choose or are unable to access this information through automated means. This data will complement the wide variety of training and labor market information already available in the One Stop Centers. This information includes the extensive labor market information available in the One Stop Centers and the automated Career Information System. In the Career Information System, training occupations are matched with labor market information such as wage rates, projected annual earnings, long term employment prospects and descriptions of work conditions. Idaho's Career Information System also provides programs of study, program cost information and a host of other information on training programs and services.

- d. *On-the-Job (OJT) and Customized Training (§§112(b)(17)(A)(i) and 134(b).) Based on the outline below, describe the State's major directions, policies and requirements related to OJT and customized training.*
- i. *In a narrative format, describe the Governor's vision for increasing training opportunities to individuals through the specific delivery vehicles of OJT and customized training.*

During the last two program years, the Workforce Development Council has earmarked a portion of WIA State 15% funds to develop and support customized training proposals. Proposal guidelines were structured to allow replicability using local WIA funds for future expansion of these activities at the local level. Due to decreased WIA funds for PY05, the Workforce Development Council will continue funding of the pilots established during PY'04 and will consider additional proposals weighed against needs for additional dislocated worker and youth proposals.

In an effort to ensure the workforce system attains economic development goals outlined by Governor Kempthorne, state staff will provide technical assistance and arrange for training to increase the awareness of the opportunities and the technique used in developing OJTs.

ii. *Describe how the State:*

- *Identifies OJT and customized training opportunities;*

OJT opportunities are identified by case managers performing job development employer contacts and through employer voiced interest in response to marketing efforts. Customized training opportunities are identified by workforce, economic development, or education partners through routine contacts with business and cross-marketing of services available throughout the system.

- *Markets the concept as an incentive to untapped employer pools including new business to the State, employer groups;*

Idaho's Business Services Brochure which promotes the use of customized and OJT training, is available through all One Stop Centers and on the State's website. The brochure is also used during in-person One Stop Center outreach to new and expanding businesses in Idaho.

- *Partners with high-growth, high-demand industries and economically vital industries to develop potential OJT and customized training strategies;*

All One Stop offices will have the training and support to become full service business centers incorporating the Council's focus on high growth, high demand industry needs across the state. This will build upon previous efforts started in 2003 to identify opportunities to better serve businesses that culminated in PY'04 funding of four incumbent worker/customized training projects in the health care and construction industries. These projects will continue in the first year of the plan and new projects will be identified as funding permits.

- *Taps business partners to help drive the demand-driven strategy through joint planning, competency and curriculum development; and determining appropriate lengths of training*

The Workforce Development Council is also embarking on a project identified in the Policy Academy process to organize education, employment and economic development services into career clusters. Business Industry Consortia have been developed in two critical industries and will be considered for others as the project moves forward. These and other critical activities have been chronicled in a monograph that is soon to be published. The monograph documents the extensive training for staff of one stop partner agencies, models that support the view of business as the primary customer and the comprehensive integration of employment, education and economic development services.

- *Leverages other resources through education, economic development and industry associations to support OJT and customized training ventures.*

The Governor's Workforce Development Council will continue its recent efforts to focus the workforce system on the needs of business. It recently adopted a challenging set of Policy Academy goals and strategies for better meeting business needs, and authorized the regional allocation of WIA 15% Discretionary Funds for High Growth Business Pilots. This initiative will fund four customized/incumbent worker training projects that will prepare new employees or lower-skilled, lower-wage incumbent workers for employment in higher-wage skilled occupations. These projects were funded due to their financial partnership with business and due to their "replicability" using local funds..

4. *Service to Specific Populations. (§112(b)(17)(A)(iv).)*
 - a. *Describe the State's strategies to ensure that the full range of employment and training programs and services delivered through the State's One-Stop delivery system are accessible to and will meet the needs of dislocated workers, displaced homemakers, low-income individuals such as migrants and seasonal farmworkers, women, minorities, individuals training for non-traditional employment, veterans, public assistance recipients and individuals with multiple barriers to employment (including older individuals, people with limited English-speaking proficiency, and people with disabilities.)*

The One Stop system has been developed to address the needs of customers with special needs. The electronic *Idaho Works* continues to expand the array of employment and training opportunities available to customers. Self-accessed services are available to customers in homes via the Internet, through the One Stop Centers, Affiliate sites and at remote locations throughout the state. Staff assisted services will be made available to those customers with disabilities, older workers, non-English proficient and other special populations who are not able to utilize the self-help systems or prefer individualized assistance. The One Stop system will improve the delivery of information regarding services available to special populations and streamline referrals to Partner agencies for services.

The State Partners will continue to identify and expand the delivery of information disseminated in Spanish for that segment of customers from our migrant and seasonal workforce as well as other customers with limited English language skills. Statewide procedures have been developed to offer interpretive services for other non-English speaking customers, including a Language Line Service for use by staff to connect minority customers with staff who are able to speak a customer's primary language. During the last decade, Idaho Commerce and Labor has doubled its minority workforce to help improve services to minorities. As a result, more than 130 employees are fluent in a language other than English (18, including American Sign Language) and are able to provide assistance to customers in need in their primary language.

As noted in sections IX.C.4.h & i, the state conducts extensive outreach activities, in coordination with other public and private community organizations, targeting migrant and seasonal farmworker and Hispanic customers. Work continues with the state's Native American populations throughout the state, including regular staff visits to tribal locations to provide workforce development system information to its members. Although the state does not have a large minority population outside these two major groups, efforts are still made to reach out to groups with significantly smaller populations, most of which are situated in the population bases with universities or other higher educational institutions. As a result, local offices in those areas make an extended effort to keep in contact with university student employment offices as well as any job fairs that may take place in the area in order to help meet minority students' needs.

Close working partnerships with the Department of Health and Welfare at both the state and local level will ensure that the full range of services available in the One Stop system is offered to public assistance recipients. DHW is represented on the Workforce Development Council and is an active partner in coordinating the delivery of Temporary Assistance for Families in Idaho (TAFI) with WIA Title I services. Although the state has determined that sufficient TAFI funds exist and that public assistance recipients will not constitute a priority group under WIA, services to TAFI participants may be provided under Title I, if needed and as appropriate to enable the move to self-sufficiency and employment.

Information regarding non-traditional training opportunities will be made available through the *Idaho Works* system. In addition, One Stop Operators will utilize various approaches offered via core and intensive services to inform and refer customers to non-traditional career opportunities. One Stop Operators will coordinate with the regional Partners representing the local Workforce Training Network (WTN) institution to increase awareness and participation in non-traditional training programs. Idaho's Centers for New Direction provide employment and training services for displaced homemakers and single parents through the WTN institutions. The centers, which promote non-traditional training and employment for this population, participated on the One Stop Regional Collaborative Teams and serve as part of the service provider network in each workforce area in the state.

Services to low income individuals, dislocated workers and displaced homemakers will be available throughout the One Stop system to offer core, intensive and training services as needed to obtain or retain employment. Efforts to assist dislocated workers will be coordinated with Rapid Response activities conducted by the State Dislocated Worker Unit to address the needs of workers impacted by mass layoffs and closures. Reemployment services through the One Stop system will be made available to small business operators, farmers and ranchers who have been determined eligible for Dislocated Worker services.

The State has established policies and procedures to ensure compliance with the non-discrimination and equal opportunity provisions of all applicable laws. Provisions will be included in each subrecipient agreement under the Workforce Investment Act that require compliance with non-discrimination and equal opportunity statutes. Appropriate notice will be provided to system customers of their rights under these laws and that a complaint process, including alternative resolution procedures, is available. The State will include a review of compliance with said statutes in its oversight and monitoring activities. The State will ensure facilities are accessible, that reasonable accommodations are available to customers with disabilities, that communication with customers with disabilities is as effective as communications with others, auxiliary aids and services are available, and that translation assistance will be provided to significant populations of Limited English Speaking People.

- b. Describe the reemployment services you will provide to unemployment insurance claimants and the Worker Profiling services provided to claimants identified as most likely to exhaust their unemployment insurance benefits in accordance with section 3(c)(3) of the Wagner-Peyser Act.*

With the passage of the Unemployment Compensation Amendments of 1993 which amended the Social Security Act, a new system was initiated which established procedures to profile UI claimants and identify those who are likely to exhaust their unemployment insurance. The amendments require that those workers who need job search assistance to find new employment be referred to reemployment services. Reemployment services are provided with ES and WIA resources.

Because Idaho's *IdahoWorks* system houses both the UI and ES data in a single database, UI claimants who are required to look for work are obligated to register with ES (Wagner-Peyser services) when they file their Unemployment Insurance claims. Additionally, most Commerce and Labor local offices have "blended" staff where the same person provides both ES and UI services to claimants; true "one-stop" service. Even when the staff is not "blended", personnel sit side-by-side and easily refer customers between programs.

All claimants who are registered for work in *IdahoWorks*, are entitled to all services that are available in all of our 24 local offices and on the internet. As a result, the service that each

claimant receives is “tailored” to their needs. i.e. those folks that need one-on-one services can request them from their local office while those that can best be served by self-service can accomplish that at home via the internet.

To maximize the coordination and efficiency of the Worker Profiling and Reemployment Services program, Reemployment Services staff will provide documentation, including case management reports, if appropriate, to Unemployment Insurance funded staff for those Reemployment Services customers who do not report for services or cooperate with their individual service plan. This documentation, and additional information as appropriate, will serve as the basis for denying Unemployment Insurance benefits to claimants who fail to comply with the provisions of the law. Additionally, Reemployment Services staff will coordinate with Unemployment Insurance staff to correlate the continued receipt of Unemployment Insurance benefits with successful progress towards completion of the individual service plan.

Reemployment services for those referred include at a minimum:

Orientation - the process of informing claimants why they have been selected for reemployment services, the variety of comprehensive and beneficial services available and the mandatory nature of profiling program participation.

Assessment - the process of collecting and analyzing information from the claimant to determine the best mix of services necessary to obtain employment. Information areas may include an applicant's needs, strengths, support systems, education, job skills, interests and career objectives and current work search activities. Information may be gathered informally, via interviews or observations, or formally via assessment tools such as aptitude tests, computer assisted programs and interest inventories.

Profiled claimants who are determined during the orientation and assessment process to meet other conditions for exemption status will not be required to participate in further reemployment services. Those not exempted will be required to participate in at least one reemployment service.

- c. *Describe how the State administers the unemployment insurance work test and how feedback requirements (under §7(a)(3)(F) of the Wagner-Peyser Act) for all UI claimants are met.*

Unemployment Insurance claimants who are not job or union attached, are required to complete the Wagner-Peyser registration process and are then referred to suitable work as job openings are identified. Filing of a new UI claim online also includes completion of the work registration process. Because Idaho's *IdahoWorks* system houses both the UI and ES data in a single database, UI claimants who are required to look for work register with ES (Wagner-Peyser services) when they file their Unemployment Insurance claims, whether in person or online via the Internet. Claimants who obtain a referral to a job opening from the ES system have that referral logged on the *IdahoWorks* list of services. Both ES and UI staff members have access to the data and are able to see if a claimant refused or did not follow through on a job referral. All staff members are trained to recognize and follow-up on referrals when a claimant does not follow through on a referral or job test. The state is currently participating in a pilot to verify that a claimant is seeking suitable work. It is anticipated that this pilot will enhance opportunities for a quality feedback loop.

- d. *Describe the State's strategy for integrating and aligning services to dislocated workers provided through the WIA rapid response, WIA dislocated worker, and Trade Adjustment Assistance (TAA) programs. Does the State have a policy supporting co-enrollment for WIA and TAA?*

WIA Dislocated Worker and Trade Adjustment programs are both administered through the One Stop Centers. Since the inception of WIA, any means of cost sharing has been emphasized to increase the impact of limited funds. In Idaho, the State-level rapid response team includes staff from the dislocated worker, UI and TAA units. When notified of any closure or mass layoff, the team quickly broadens to include local delivery staff with expertise in provision of rapid response, dislocated worker, UI, TAA, and Wagner-Peyser services. This state-local team communicates with the employer and employee representatives, assesses initial community impact, identifies and includes other partners for rapid response assistance, and develops integrated service delivery schedules to meet the needs of each individual employer and the impacted workers. Team members work closely with service provider management staff to develop a service delivery plan that coordinates resources and ensures one-stop access to information and enrollment in UI, TAA, WIA, and Wagner-Peyser, many times at the job site prior to dislocation. Idaho's rapid response delivery system provides the impacted worker with coordinated application and enrollment for WIA, TAA, and Wagner-Peyser services. Forms used for WIA career assessment and retraining plans are accepted for the TAA program, eliminating client redundancies and streamlining co-enrollment processes. Although co-enrollment is not mandated, rapid response service delivery planning has ensured the majority of TAA recipients in Idaho are also being served with WIA funds. The state requires co-enrollment of TAA recipients whenever they receive WIA staff or other supportive services.

- e. *How is the State's workforce investment system working collaboratively with business and industry and the education community to develop strategies to overcome barriers to skill achievement and employment experienced by the populations listed in paragraph (a.) above and to ensure they are being identified as a critical pipeline of workers?*

Beyond the workforce system structure which provides a voice and a response to those partners dedicated to resolving the needs of specific populations described under paragraph (a.), the Workforce Development Council's adoption of Policy Academy goals and strategies will further strengthen collaboration between business, the workforce system and education to meet the needs of all citizens to overcome barriers and ensure they are being identified as a critical pipeline of workers. The Workforce Council goals also outline goals to meet the needs of all populations, including special populations. These may be found as attachments to this document.

- f. *Describe how the State will ensure that the full array of One-Stop services are available to individuals with disabilities and that the services are fully accessible?*

The state has developed a Methods of Administration which offers a comprehensive description of actions taken to ensure that the One Stop system in Idaho addresses the needs of customers with special needs, to include the full array of available services. All One Stop offices currently comply with ADA legislation to ensure access for persons with physical disabilities, providing for the most integrated setting possible for serving customers with disabilities. One-Stop Center computers are able to enlarge print for customers with visual disabilities. The Department of Commerce and Labor maintains a verbal agreement with the Idaho Commission for the Blind and Visually Impaired for Braille, tape, or large print of written information and maintains a verbal agreement with the Council for the Deaf and Hard of Hearing for a directory of Sign Language and Oral Interpreters. Local level staff are instructed to contact the EO Officer or Personnel Office by phone or e-mail to request a service or the required information.

Additionally, the EO Officer maintains liaison with disability groups such as Vocational Rehabilitation, Council on Developmental Disabilities, and Idaho Task Force on the ADA

to ensure policies are communicated and to utilize these groups as resources available to customers with disabilities. The Idaho Department of Commerce and Labor web site “*IdahoWorks*” and the computer-generated self-registration include taglines to ensure clear communications regardless of the process utilized by the customer. The EO Officer coordinates with the Publications Committee of the Department to ensure taglines and other appropriate information are included and effective on publications. A comprehensive list of resources for serving the disabled have been made available on the WIA portal.

- g. Describe the role LVER/DVOP staff have in the One-Stop Delivery System? How will the State ensure adherence to the legislative requirements for veterans’ staff? How will services under this Plan take into consideration the agreement reached between the Secretary and the State regarding veterans’ employment programs? (§§112(b)(7), 112 (b)(17)(B); 322, 38 U.S.C. Chapter 41; and 20 CFR §1001.120.)*

One Stop system veteran customers will be provided the full array of services available within the system, empowered with customer choice and customized access to those services that satisfy their individual needs for career development. Access to the system will be provided universally to assure customers that there is no wrong door. In the provision of these services veterans’ priority will be followed in accordance with 38 USC Chapter 41 and 20 CFR 1001.100 et seq. and the provision of the DVOP and LVER grants. The DVOP and LVER will facilitate veteran access to all employment and training programs, including WIA.

Since the One Stop centers throughout the state of Idaho are operated by the State’s Wagner-Peyser, and Jobs for (LVER/DVOP) grantee, many of the historical operating procedures, ensuring adherence to the legislative requirements for veterans’ staff will remain in effect, such as facilitating employment, training and placement services furnished to veterans in a state under the applicable state employment service delivery systems.

This includes the roles and responsibilities of DVOPs and LVERs , as outlined in VPL no. 11-02, which are integrated into the delivery of services to veterans within all the One Stops in the state in order to meet their employment needs. These processes will not negatively impact customer choice, but ensure that veteran funded staff will provide service only to veterans or eligible persons; that they will not supplant Wagner-Peyser funded staff; and that veterans will receive priority service in employment and training opportunities in accordance with 20 CFR 1001.100 et seq. and PL 107-288.

The functional integration of veteran staff and their roles will be carried out to the fullest extent possible within the One Stop system. An example of this is the DVOPs role. They must concentrate their efforts on serving those veterans who have special employment and training needs by focusing on the facilitation of intensive services through case management, especially for those who are not able to obtain employment through the provision of core services. As such, if a veteran does not require intensive services or case management, non-veteran staff should be able to meet the needs of the veteran by providing them core services directly. In this process, non-veteran staff would help to meet the needs of veteran customers twofold- a) they could offer a core service directly to the veteran customer, which b) would allow the DVOP to focus on initiating the intensive services for those veterans who truly require the assistance.

LVERs are required to establish contact plans with employers in order to develop employment and training opportunities for the benefit of veterans. The One Stop system has developed a Business Relations Initiative that focuses on the premise that the best way to help job seekers and hard-to-place customers find jobs is to satisfy business

customers. With this premise as its core, each office within the system has established a committee (Business Relation Initiative Committee-BRIC) to target employers in its area. To be successful in this endeavor, staff must know what it is they are marketing, to whom they are marketing, why they are doing it, and how they can do it effectively. By integrating LVERs into this committee already in place, they will be able to focus on marketing veterans to employers for employment and training opportunities.

- h. Department of Labor regulations at 29 CFR 37, require all recipients of Federal financial assistance from DOL to provide meaningful access to limited English proficient (LEP) persons. Federal financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance. Sub-recipients are also covered when Federal DOL funds are passed through from one recipient to a sub-recipient. Describe how the State will ensure access to services through the State's One-Stop delivery system by persons with limited English proficiency and how the State will meet the requirements of ETA Training and Employment Guidance Letter (TEGL) 26-02, (May 29, 2003) which provides guidance on methods of complying with the Federal rule.*

Using its Methods of Administration as a foundation, The Department of Commerce and Labor established a communication policy to address its responsibility in offering services to Limited English Proficient individuals by providing meaningful access to Department programs and services as required by Executive Order 13166, Title VI of the Civil Rights Act of 1964 and Section 188 of the Workforce Investment Act of 1998. This policy follows the guidance issued by the U.S. Department of Labor for recipients of federal financial assistance regarding Title VI's prohibition against national origin discrimination.

The Workforce System and its One-Stop Career Centers sponsor a variety of services that reach those with limited English proficiency (LEP). To help accomplish this, they use media advertising (PSAs) and send notices to, and consult with, local community organizations. The Department of Commerce and Labor operates an effective employment services outreach program statewide with outreach staff that is bilingual in English and Spanish to inform customers, especially farm workers, of the services available. These outreach activities are coordinated with other public and private community organizations, One-Stop partners, and MSFW service providers in order to inform as many customers as possible. This information is presented in both English and Spanish, which is the predominate language spoken by Idaho LEP residents at 2.8% of the population. And special presentations are also made to English as a Second Language groups, Hispanic high school students and farm workers to teach participants the basics of personal computing so they can access the *IdahoWorks* system.

To assist in determining the level of necessary and reasonable oral interpretation and written translation services to be offered to customers with LEP, the Department will make an annual assessment of the language needs of LEP customers and potential customers.

To make this assessment, the Department uses the following data: (1) information from cost centers within the system on LEP customer utilization, potential LEP customers and bilingual staffing; (2) current census data on households where English is spoken "less than very well" in each county in Idaho and grouped by WIA regions and local office locations; (3) current census data on Idaho's population by language spoken at home; (4) seasonal demographic data from the census; (5) labor market information on seasonal populations; (6) demographic information from other state agencies on LEP languages encountered throughout the state; and (7) information from community based minority organizations on LEP customers served.

The following four factors will be used by the State to determine what constitutes reasonable steps to ensure meaningful access to LEP customers:

1. The number or proportion of LEP customers in the eligible service population;
2. The frequency with which LEP customers come into contact with the program;
3. The importance of the service provided by the program; and
4. The resources available to the Recipient to provide access.

The correct mix of language services must be based on what is both necessary and reasonable in light of this four-factor analysis. Recipients have two main ways of providing language assistance: oral interpretation, either in person or via a telephone interpretation service; or written translation. Oral interpretation can range from on-site interpreters for critical services provided to a high volume of LEP customers, to access through commercially available telephonic interpretation services. Written translation can range from translation of an entire document to translation of a short description of the document. In some cases, language services should be made available on an expedited basis while in others the LEP customer may be referred to another office for language assistance.

At a minimum, LEP customers will be offered oral interpretation services to help them access and understand Recipient programs. Regarding the need for written translations, it is the responsibility of each Recipient to determine which forms, publications or other materials need written translation. Vital documents that may need to be translated include applications for services; public notices; information on program requirements; information on customers' rights and responsibilities; notices regarding the reduction, denial or termination of services; and Recipient consent, complaint, and intake forms.

- i. Describe the State's strategies to enhance and integrate service delivery through the One-Stop delivery system for migrant and seasonal farm workers and agricultural employers. How will the State ensure that migrant and seasonal farm workers have equal access to employment opportunities through the State's One-Stop delivery system? Include the following:*
 - *The number of Migrant and Seasonal Farmworkers(MSFWs) the State anticipates reaching annually through outreach to increase their ability to access core, intensive, and training services in the One-Stop Career Center System.*

The State has automated and integrated the delivery of services within the One Stop System, and included strategies designed to better serve and provide these services to the MSFW customer. Currently, the State's electronic self-registration system for labor exchange, *IdahoWorks*, and the Customer Satisfaction Survey are available in English and Spanish in all 24 One Stop offices as well as through the State's websites. Additionally, some local Commerce and Labor offices have developed other handouts in Spanish based on local labor market conditions or information on services and procedures. The State will continue to assess the need and availability for bilingual staff in areas with a high concentration of Spanish-speaking population.

The State Monitor Advocate Unit continues to conduct ongoing monitoring of the service provided to Migrant and Seasonal Farmworkers. Office reviews are conducted to identify the needs and concerns that affect the provision of services for farmworkers, and to provide technical assistance as appropriate, and are brought to the attention of the Administrative and Executive personnel when necessary. The MAU, funded by Wagner-Peyser funds, ensures that ES services are coordinated with other MSFW service providers, helps to identify

overall changes in agricultural employment, MSFW trends, employment rights, and recommends new program approaches.

To protect the employment rights of MSFWs, federal regulations place the responsibility of administering the federal Job Service-related complaint system within the State. MSFW complaints are handled through the local Commerce and Labor offices while unresolved complaints are then referred to the Monitor Advocate's office for determination. The MAU also performs follow-up on complaints filed with local Commerce and Labor offices and referred to other agencies.

EMPLOYMENT SERVICES PROVIDED TO AGRICULTURAL EMPLOYERS

Basic labor exchange services will be provided to the agricultural employer community through the automated process of matching job seekers to job orders received as well as recruitment and direct referral from staff. The State will continue to provide information about ES services and assist agricultural employers through direct employer visits and employer outreach

The State will continue to expand services to agricultural workers and employers, including the recruitment of U.S. farmworkers, by coordinating basic labor exchange services, outreach, information dissemination, and training workshops with other One Stop partner agencies, organizations and the employer community. Working relationships exist with the Idaho Migrant Council, Idaho Legal Aid Services, Inc., and various agricultural producer organizations to provide services and information.

OUTREACH PLAN

Allocated staff for outreach will be locally driven with emphasis on services that are customer-driven and customized to specific labor markets, rather than focusing solely or primarily on the number of services provided. All local Commerce and Labor offices with outreach staff have permanent and/or temporary staff that are bilingual in Spanish to conduct outreach. During the area's peak agricultural season, if resources permit, additional temporary bilingual staff will be used to support MSFW activities.

The State plans to fund a total of 2.49 FTEs for MSFW outreach in the six "significant bilingual" offices and five other offices for PY 05 and PY 06. This level of support will maintain the same number of positions that have been allocated for the current year.

Anticipated MSFW Outreach Service Goals

Commerce & Labor Local Office	FTEs PY 05/06	Outreach Days	MSFW Contacts
Bonnars Ferry	.12	3	81
Payette	.34	6	162
Emmett	.01	1	30
Canyon County	.39	9	243
Magic Valley	.32	9	243
Mini-Cassia	.40	9	243
Mountain Home	.24	4	108
Rexburg	.17	5	135
Pocatello	.05	3	81
Blackfoot	.27	5	135
Idaho Falls	.19	3	81
Total	2.49	57	1542

Staff assigned to outreach will contact MSFWs at their work sites, labor camps, living areas, and other places frequented by the migrant and seasonal farmworkers. Outreach workers will encourage MSFWs to visit the local One Stop office, but may provide on-site assistance for services including: work registration, referrals to available job openings for which they qualify, prepare and accept complaints or apparent violations, provide information on local labor markets and training opportunities or refer workers to other service providers. Outreach activities will be coordinated with other public and private community organizations and One Stop partners, in order to inform as many MSFWs as possible as to the services that are available through Commerce and Labor, its website, and other providers.

The State of Idaho through its network of 24 Commerce and Labor offices in the State's One Stop system will fully comply with provisions of 20 CFR, Part 653, Subpart B and Part 658, Subpart E. The operational objective of the State is to provide qualitatively equivalent and quantitatively proportionate service to MSFWs compared to non-MSFWs in all ES compliance indicators.

5. *Priority of Service*

- a. *What procedures and criteria are in place under 20 CFR 663.600 for the Governor and appropriate local boards to direct One-Stop operators to give priority of service to public assistance recipients and other low-income individuals for intensive and training services if funds allocated to a local area for adult employment and training activities are determined to be limited? (§§112(b)(17)(A)(iv) and 134(d)(4)(E).)*

With the implementation of the Temporary Assistance for Families in Idaho (TAFI) in July, 1997, Idaho's public assistance caseload has seen a dramatic decline. Due to the success in moving public assistance recipients into employment, the TAFI program has expanded services to assist families who are at risk of becoming TAFI eligible as a preventive measure. Families with incomes less than 200% of the Federal poverty guidelines and who are at risk of becoming eligible for TAFI without intervention can receive help with work-related

needs. This program enables families who qualify to get help with training costs for up to twelve months from the date they first need help. Additionally, effective January 1, 2000, the Department of Health and Welfare (DHW) began providing families receiving Medicaid and Food Stamps as well as some non-custodial parents with the same employment and training services offered TAFI participants. Therefore, the State determined that sufficient TAFI funds exist statewide to serve public assistance recipients and that local areas be relieved of the requirement of providing priority to this population.

Local boards were given the opportunity to analyze the customer need in relation to resource availability, in order to determine whether there are sufficient funds available in the local area to serve all adults appropriate for intensive and training services. If the analysis demonstrated that sufficient funds are available, no priority of service would be required.

If the local boards cannot adequately demonstrate that sufficient funds are available in the local area to serve all appropriate adults, local boards are required to describe in their plans the procedures that will be used to ensure that priority for intensive and training services is given to low income groups other than public assistance recipients.

Plans from each of the six Workforce Investment Areas indicate that sufficient funds did not exist and that priority for intensive and training services will be provided to low income groups other than public assistance recipients during PY'05. For PY'06, the Workforce Development Council adopted this policy on a statewide basis.

b. What policies and strategies does the State have in place to ensure that, pursuant to the Jobs for Veterans Act (P.L.107-288)[38 USC 4215], that priority of service is provided to veterans (certain spouses) who otherwise meet the eligibility requirements for all employment and training programs funded by the U.S. Department of Labor, in accordance with the provisions of TEG 5-03 (9/16/03)?

The Idaho Department of Commerce and Labor will ensure that all ES staff provide veterans with priority in direct employment and training-related services and supportive services at any One Stop Career Center receiving Wagner-Peyser funds or housing Wagner-Peyser staff as required by 20 CFR, Chapter IX, Subsection 1001.120, title 38 of US Code Chapter 41 and as set forth in the General and Special Grant Provisions of the current grant. The State has also incorporated the requirements of Jobs for Veterans Act, which gives eligible and qualified veterans (and certain spouses) priority over non-veterans. In making referrals of qualified applicants to job openings and training opportunities, the Department shall observe the following order of priority: 1) Special Disabled Veterans 2) other disabled veterans 3) other eligible veterans and eligible persons in accordance with priorities set by the Secretary, which may include veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge or expeditionary medal has been authorized, recently separated veterans (those within 36 months of separation from the military at the time of application), other eligible veterans, eligible spouses, non-veterans.

Most USDOL programs have only general program eligibility requirements and do not target specific participant groups, thus implementation of the veterans' priority has posed few practical difficulties for these programs. However, in a few programs such as the WIA-funded Adult and Youth programs, the veterans'

priority will compete with existing statutory priorities that favor certain population groups and must be taken into account when applying the priority..

A covered person is entitled to and will be given priority over non-covered persons for the receipt of employment, training and placement services if the person otherwise meets the eligibility requirements for participation in the program (see specifics below)

A covered person is a veteran:

- A. Who served on active duty for a period of more than 180 days and was discharged or released with other than a dishonorable discharge;
- B. Who was discharged or released from active duty because of a service-connected disability; or
- C. Who, as a member of a reserve component under an order to active duty pursuant to section 12301 (a), (d), or (g), 12302, or 12304 of Title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge.

A covered person also includes the spouse of any of the following:

- A. Any veteran who died of a service-connected disability.
- B. Any member of the Armed Forces on active duty who, at the time of application for assistance under this section, is listed in one of the following categories for at least 90 days: missing in action, captured in line of duty by hostile force, or forcibly detained or interned in line of duty by a foreign government or power.
- C. Any veteran who has a total disability resulting from a service-connected disability.
- D. Any veteran who died while a disability so evaluated was in existence.

For programs that have existing statutory priorities that target certain population groups, such as WIA Adult and Youth programs, the veterans' priority is applied to covered persons that meet program criteria. This means an individual meeting both the veterans' priority and the program requirements would receive the highest priority for WIA Youth or Adult services over a non-covered person, assessing the person's status in light of both the veterans' priority and the program's eligibility criteria.

Non-covered persons meeting program requirements will have preference over any covered person who does not meet these requirements. If both the non-covered person and the covered person are outside the program requirements, the covered person will have priority if the requirements of the program are ultimately met. No one, including a covered person, should receive any type of service if they do not meet the program eligibility criteria.

For programs that do not target specific groups, such as the WIA Dislocated Worker program, the veterans' priority is given to those that first meet the program's existing eligibility requirements. This means a covered person would receive priority for services over a non-covered individual, only after satisfying the Dislocated Worker program's eligibility requirements. In cases where targeting of a particular group is discretionary and not required by law, such as local policy, the veterans' priority for an individual takes precedence above the discretionary priority group.

- D. *Rapid Response. (112(b)(17)(A)(ii).) Describe how your State provides Rapid Response services with the funds reserved under section 133(a)(2).*

1. *Identify the entity responsible for providing Rapid Response services. Describe how Rapid Response activities involve local boards and Chief Elected Officials. If Rapid Response activities are shared between the State and local areas, describe the functions of each and how funds are allocated to the local areas.*

The Idaho Department of Commerce and Labor's State staff will continue in a lead role for deploying rapid response assistance to worker dislocations. Notices of plant closures and mass layoffs, as required by the Worker Adjustment and Retraining Notification Act (WARN), will be submitted to Department of Commerce and Labor. The Workforce Systems Bureau will provide copies of the notice to the Department's Division Administrators and state agencies participating in the One Stop system. Copies of the notice will also be sent to the Chair of the local Council of Governments of the area impacted by the announced closure or mass layoff.

The Idaho Department of Commerce and Labor's Workforce Systems Bureau will serve as the State Dislocated Worker Unit (DWU) and will have chief responsibility for the coordination of dislocated worker services within the Department and with other entities. The Department offers a comprehensive array of services including Wagner-Peyser, Unemployment Insurance, Trade Adjustment Assistance and Veterans services. Dislocated Worker interventions involve these programs and benefits from their services and resources. The Department's Field Services Division operates these programs. All rapid response services will be coordinated closely with the local one stops.. The Department will also coordinate closely with the State AFL-CIO in arranging services for dislocations involving organized labor

2. *Describe the process involved in carrying out Rapid Response activities.*
 - a. *What methods are involved in receiving notice of impending layoffs (include WARN Act notice as well as other sources)?*

All dislocation notices received due to WARN Act will be reviewed by the DWU and the appropriate response will be developed in close coordination with the Department's Field Services Division and the local One Stop management staff. The State AFL-CIO will be consulted on dislocations involving organized labor. If it is determined that there will be significant dislocation which warrants state rapid response, the Workforce Systems Bureau will initiate on-site contact with the employer and the appropriate employee representatives to assist in arranging the most effective reemployment activities. These contacts will take place as soon as possible. In addition, the DWU will respond to publicly announced large layoffs in the same manner as described above. The local One Stop manager will take the lead in responding to smaller dislocations

- b. *What efforts does the Rapid Response team make to ensure that rapid response services are provided, whenever possible, prior to layoff date, onsite at the company, and on company time?*

The Rapid Response Team will promote early intervention to worker dislocations. Based on information from the company, the Rapid Response Team will develop the appropriate service delivery strategy. The response will take into account the skills of the impacted workers, the potential for direct job placement, and the availability of resources to address the short and long-term needs of the workers. Services will include on-site information meetings on available employment and training programs, employee surveys, aggressive promotion of services and coordination with training providers. The State DWU and local One Stop staff will coordinate to ensure that the employees receive information on the services available through the workforce system programs including the One Stop Center, the postsecondary school(s) in the area and the WIA programs. Based on the availability of resources and the company's receptiveness, the Rapid

Response Team will determine what services to offer on-site. This will include financial management, job search assistance and other workshops as requested. If appropriate, fully automated on-site reemployment centers will be established and staffed.

In addition to promoting core services, the Rapid Response Team will encourage the use of intensive and training services for appropriate individuals. The WIA Title I Dislocated Worker service provider will conduct an individual assessment of the impacted worker to determine the appropriate services. The in-depth assessment will determine the appropriate service delivery plan for all customers including those with multiple barriers to reemployment.

Labor/Management Committees will be the preferred method of assistance in responding to large closures and layoffs. Each year, the State will set aside \$200,000 of the Title I Dislocated Worker 25% funds to support rapid response. The first priority for these will be to encourage companies to participate in Labor/Management Committees. These funds will be utilized to supplement the local WIA Title I services and will support core, intensive and training services for the employees of the company. The Department will consider utilizing the committee approach and providing rapid response assistance for closures involving 50 or more employees. The DWU's decision will be guided by such factors as:

- 1) whether dislocations are permanent and the employees have no bona fide offer of reemployment;
- 2) the impact of the dislocation on the community;
- 3) potential benefits of state intervention on the reemployment effort; and
- 4) willingness of the company and the employees to participate in the effort.

Second priority for funding will be to support services for dislocations where the DWU and the local One Stop staff have agreed that it is appropriate for the local area to take the lead in organizing the response. This is a typical response to smaller dislocations. Funds will be made available when the local area lacks resources to meet the demand for services.

The Rapid Response Team will also review and evaluate the potential for layoff prevention services. The goal of these efforts will be to retain the business and to minimize any downsizing effort. If appropriate, the DWU and local One Stop staff will also present local economic development programs in identifying layoff prevention options. These efforts will include determining appropriateness of requesting assistance from the State's Workforce Development Training Fund.

The balance of Rapid Response funds not required to support the above activities will be allocated to the local providers to supplement their Dislocated Worker area allocations. Priority for funding will include support for carry-in participants and areas experiencing increases in dislocations. Funds will be allocated based on these needs and/or through the Dislocated Worker substate funding formula.

- c. What services are included in Rapid Response activities? Does the Rapid Response team provide workshops or other activities in addition to general informational services to affected workers? How do you determine what services will be provided for a particular layoff (including layoffs that may be trade-affected)?*

The Department's Workforce Systems Bureau will be responsible for coordinating the rapid response activities including the initial employer/employee contacts, promoting and establishing Labor/Management Committees, collecting information on dislocations and available resources, providing and arranging technical assistance for the response effort, disseminating information on available program services and assisting local efforts. Workforce Systems will also be responsible for coordinating Dislocated Worker and Trade Adjustment Assistance Programs for impacted workers. At the State level, these efforts will be coordinated with the Division of Professional-Technical Education, Idaho Commission on Aging, Health and Welfare, and agency economic development specialists.

Within the Department, the rapid response activities will involve and be closely coordinated with the Field Services Division, Benefits Bureau, Research and Analysis Bureau, Marketing, and One Stop offices. The Field Services Division will assist in the initial contacts with the employer and in organizing and participating in the appropriate method of response to the dislocations. The Benefits Bureau will assist in coordinating the Unemployment Insurance and Trade Adjustment Assistance Act with the reemployment effort. The Research and Analysis Bureau will provide labor market data and information on unemployment insurance claimants. The Workforce Systems Bureau will also collect information on available resources and provide technical assistance to the response effort. The Department's Information Officer will disseminate information on the available services as well as information on specific rapid response efforts. One Stop staff will provide assistance with the Unemployment Insurance, Employment Service, Veterans Services, Trade Adjustment Assistance and WIA Title I in the areas they provide those services.

The Workforce Systems Bureau will be responsible for contacting the employer and employees to obtain agreement to participate in the joint Labor/Management Committee and for scheduling the initial meeting. In addition, the Bureau will be responsible for assisting the committee in selecting a neutral chair; providing the committee with training on their roles, goals, and procedures; arranging financial support for the committee; arranging state and local coordination and providing technical assistance. The Bureau will also assure that rapid response services are well coordinated with the appropriate local elected officials.

Via a grant of Rapid Response funds, the Idaho State AFL-CIO will participate in rapid response activities for dislocations involving organized labor. The AFL-CIO will assist in obtaining labor's participation in the reemployment effort and will participate in disseminating information on program services. The AFL-CIO will assist in identifying Labor/Management Committee chairs acceptable to the employees and will assist in identifying the employees' representatives for the committees. When appropriate, the AFL-CIO will assist the committee in organizing informational workshops for the displaced workers and in promoting service utilization. Also, the AFL-CIO will assist in identifying appropriate layoff prevention strategies. Organized labor coordination will be supported with rapid response funds.

The One Stop Management staff will be responsible for coordinating local workforce investment activities with the State's rapid response efforts. This effort includes making WIA Title I resources available to support services for dislocated workers targeted by rapid response efforts. The staff will assist the State in promoting rapid response, early interventions services and Labor/Management Committees. The staff will participate in rapid response informational meetings, Labor /Management Committee meetings and will assist in helping develop response plans to worker dislocations. The One Stop staff also will assist in coordinating services with local economic development efforts and the appropriate local elected officials.

3. *How does the State ensure a seamless transition between Rapid Response services and One-Stop activities for affected workers?*

Since the One Stop management and frontline staff are deeply involved in each Rapid Response intervention at the earliest stages, transitioning to One Stop activities is truly seamless for affected workers.

4. *Describe how Rapid Response functions as a business service? Include whether Rapid Response partners with economic development agencies to connect employees from companies undergoing layoffs to similar companies that are growing and need skilled workers? How does Rapid Response promote the full range of services available to help companies in all stages of the economic cycle, not just those available during layoffs? How does the State promote Rapid Response as a positive, proactive, business-friendly service, not only a negative, reactive service?*

Idaho Commerce and Labor has years of experience providing rapid response services to our business community. Our proven track record is evident by our successful performance. Companies view our services as positive, proactive, and business-friendly.

Idaho's Rapid Response Team provides the following activities for our business community:

- a. Immediate and on-site contact with the employer, representatives of the affected workers, and the local community.
- b. Information and immediate access to unemployment compensation benefits, comprehensive One-Stop system services, and employment and training activities, including TAA.
- c. Establishing labor/management committees
- d. Developing a coordinated response which may include the development of an application for a National Emergency Grant.
- e. True connection with economic development activities through the merger of Commerce and Labor

Idaho Commerce and Labor uses every opportunity to promote the full range of business services at each contact independent of the reason for that contact. This brings a comprehensive range of economic development, workforce development and education services to the attention of the businesses we serve.

5. *What other partnerships does Rapid Response engage in to expand the range and quality of services available to companies and affected workers and to develop an effective early layoff warning network?*

As indicated above, the Rapid Response team brings the wide range of resources available through the states employment, education and economic development service providers. Depending on the needs of individuals, the team also brings in community resources to offer help in areas ranging from health insurance to child care to financial planning and more. Because of solid connections established through economic development, workforce development and employment during periods of growth and expansion, the Department has wide access to contacts who also advise in times of downsizing.

6. *What systems does the Rapid Response team use to track its activities? Does the State have a comprehensive, integrated Management Information System*

that includes Rapid Response, Trade Act programs, National Emergency Grants, and One-Stop activities?

Idaho's Management Information System currently provides integrated participant, financial, and management reporting for WIA Dislocated Worker and NEG. Inclusion of TAA is in development and should be completed prior to PY06. Tracking Rapid Response team activities continues on the intra-agency communications system.

7. *Are Rapid Response funds used for other activities not described above (e.g., the provision of additional assistance to local areas that experience increased workers or unemployed individuals due to dislocation events in case of unusually large layoff events)?*

With \$200,000 retained for Rapid Response activities at the State level, the balance of funds are allocated to local areas as they experience increased numbers of individuals in need of dislocated worker services due to layoffs or closures. The state will analyze needs in the region giving first priority to continued training of those already enrolled before providing funds for new enrollments. Given the significant cut, it is not anticipated that the state will be able to maintain a set aside to arm against larger closures; rather, we will rely on applications for NEGs.

- E. *Youth. ETA's strategic vision identifies youth most in need, such as out of school youth, (and those at risk) youth in foster care, youth aging out of foster care, youth offenders, children of incarcerated parents, homeless youth, and migrant and seasonal farmworker youth as those most in need of service. State programs and services should take a comprehensive approach to serving these youth, including basic skills remediation, helping youth stay in or return to school, employment, internships, help with attaining a high school diploma or GED, postsecondary vocational training, apprenticeships and enrollment in community and four-year colleges. (§112(b)(18).)*

1. *Describe your State's strategy for providing comprehensive, integrated services to eligible youth, including those most in need as described above. Include any State requirements and activities to assist youth who have special needs or barriers to employment, including those who are pregnant, parenting, or have disabilities. Include how the State will coordinate across State agencies responsible for workforce investment, foster care, education, human services, juvenile justice, and other relevant resources as part of the strategy. (§112(b)(18).)*

State youth programs operating under WIA have been integrated with Governor Kempthorne's Generation of the Child initiative. Through this, the workforce system will participate as part of a highly coordinated, continuum of services designed to assure that healthy, well-nurtured, and well-educated children enter adulthood as productive members of the workforce.

Among the youth services available on a statewide basis are the employment and training services offered under the Workforce Investment Act, labor exchange services offered through Wagner-Peyser, services for youth who have entered the juvenile justice system through the Department of Juvenile Corrections and county probation offices, services to youth in families receiving, at risk of needing, or transitioning from public assistance through the Idaho Department of Health and Welfare, vocational training opportunities at the secondary and postsecondary level provided through the public school system and postsecondary technical colleges, services to youth with disabilities through the Idaho Division of Vocational Rehabilitation, and elementary and secondary

educational services offered through the Department of Education and local secondary school districts. In addition, the Idaho Migrant Council offers employment and training services to migrant and seasonal farmworker youth at various sites across the state. Although federal School To Work funding has ended, local efforts continue across the state to provide opportunities to youth as they transition from the world of learning to the world of earning. These statewide services have been augmented by a network of local providers and community based organizations throughout the state, including Native American grantees within the state who provide employment and training services to Native American youth.

A number of highly effective partnerships have been developed among the agencies listed above in the delivery of youth services on a statewide level and through local youth efforts.

Because WIA funds are limited, development of a comprehensive, community-wide approach to meeting the needs of youth requires collaboration among a variety of workforce, educational, and related agencies to develop program strategies that address the multiple needs of youth and establish the sequence of services needed to help youth move toward functioning as effective citizens, family members and employees.

Most coordination with foster care, education, welfare, and programs that serve youth with special barriers to employment, including youth with disabilities takes place locally through various linkages already in place. Several representatives of these same local level programs serve on the Workforce Development Council and participate at the state level to develop strategies to serve youth with special needs. Service providers at the local level have also employed a variety of approaches to collaborate on service delivery.

2. *Describe how coordination with Job Corps and other youth programs will occur. (§112(b)(18)(C).)*

Job Corps has had a voice in the design and delivery of local WIA youth activities either through participation on local Youth Councils or through the linkages mentioned above. Through these mechanisms, they have had and continue to have several options to assure appropriate access to youth activities for Job Corps participants. Contractors for Job Corps regularly schedule visits to One Stop Centers and affiliate locations to recruit new participants. Youth service providers also routinely make referrals to the Job Corps. Federal contracts also avail themselves of the placement opportunities available in the One Stop system as participants are transitioned to their home communities.

As mentioned earlier in the plan, with the advent of the shared federal vision for youth – *Creating a Collaborative Approach to Prepare Youth for Success in a Global, Demand-Driven Economy*- and USDOL's New Strategic Vision for the Delivery of Youth Services under the Workforce Investment Act, the state has mobilized its efforts to follow the lead established by its federal partners. Accordingly, the groups participating in this effort will represent a broad spectrum of youth populations in need throughout the state, including Job Corps. With its staff participating in one of the regional forums rolling out the shared federal vision for youth, Job Corps is expected to play a significant role in this process within the state.

3. *How does the State Plan to utilize the funds reserved for Statewide activities to support the State's vision for serving youth? Examples of activities that would be appropriate investments of these funds include:*
 - a. *utilizing the funds to promote cross agency collaboration;*
 - b. *demonstration of cross-cutting models of service delivery;*
 - c. *development of new models of alternative education leading to employment; or*
 - d. *development of demand-driven models with business and industry working collaboratively with the workforce investment system and education partners to develop strategies for bringing these youth successful into the workforce pipeline with the right skills.*

As noted earlier under Section I, the State's vision for serving youth falls directly under the Governor's broad strategic youth initiative known as the Generation of the Child. The workforce development system is a partner in the initiative, as it participates as a component of a highly coordinated continuum of services designed to assure youth are well prepared to enter adulthood as productive members of the workforce.

As part of this current planning cycle, the WDC will allocate additional funds for youth in need to local areas to provide additional funds for current providers to serve at risk youth. Because of the large drop in funding, only limited resources will be available for specific program services. During PY'06, the council will examine the use of the youth in need funds to determine if further direction is required to drive resources to those identified as most in need. In the interim, the state will continue to monitor services to populations identified as most in need to ensure that they continue to receive these services.

- e. *Describe how your State will, in general, meet the Act's provisions regarding youth program design. (§§112(b)(18) and 129(c).)*

The State has undertaken significant efforts to insure that its youth program complies with provisions regarding youth program design. State personnel embarked upon extensive and in-depth analysis to determine the appropriate approach to implementing a successful youth program which, based on its recent performance outcomes and results, appears to have been achieved, noting that many of its participants have moved on to successful endeavors, allowing them to compete in the market place of this demand-driven economy.

Considerable research has been conducted regarding the effectiveness of various strategies for serving at-risk youth (both in-school youth and dropouts) in an effort to identify factors contributing to the success of the effective models and the demise of ineffective ones. As a result of these studies, researchers and practitioners have concluded that six design features form the foundation for effective youth programs.

As such, the State adopted these key design features as the basic policy framework for WIA youth programs in Idaho and used to develop youth strategies in the state:

- **Adult support, structure, and expectations** - advisors, mentors, role models, teachers, setting clear and high expectations;
- **Creative forms of learning**, including SCANS competencies, work-based learning, project-based learning, and other environments that make learning engaging and relevant;
- **A combination of guidance and rich connections to the workplace**, including matching youth with suitable employers, job coaching, and structured learning opportunities;
- **Support and follow-up**, including referral to or arrangement for needed ancillary services and opportunities to learn trust, as well as work ethics;
- **Using youth as resources**, allowing them to contribute to their own growth; and
- **Quality Implementation**, through well-managed programs, incorporating evaluation and continuous improvement, quality staff training and materials, and effective use of resources

Based on these key design features, the State adopted the following Guiding Principles, which are used by the State Workforce Development Council to shape youth policy and develop a comprehensive youth strategy:

- (a) The WDC will establish and oversee a system of youth development, education and training that promotes and enhances academic achievement, high school graduation, work-readiness skills, postsecondary readiness, occupational skill achievement and employment readiness.
- (b) Locally-identified needs of both dropouts and in-school youth, particularly those at risk of dropping out, will guide the design of youth programs.
- (c) Individual, in-depth, comprehensive assessments will allow services to be tailored to each youth's specific needs.
- (d) Services will be tied to the age and maturity level of each youth.
- (e) Service strategies will be sequenced over time to maximize learning gains and assimilation of appropriate work behaviors.
- (f) Service strategies for dropouts will include efforts to assist youth in achieving high school credentials.
- (g) Service strategies will emphasize the use of SCANS skills through contextual learning opportunities that combine school-based learning opportunities and work-based opportunities.

The State's approach to ensuring that the required design features are reflected in local program design is through the issuance of the State's comprehensive youth policy as described above, including the Guiding Principles used by local boards in developing local strategies for PY'05. Planning Guidelines ask what each local area's strategy is to make the ten required elements available, and have been continually reviewed by the State to ensure that the requirements of §129 of the Act are clearly met. **These guidelines will continue to be used to develop local strategies for PY'06 and beyond.**

Local areas generally work closely with secondary and alternative schools across the state in dropout prevention efforts with a goal toward high school completion and preparation for postsecondary opportunities. Tutoring, basic skill remediation, employability competency training, counseling, work opportunities and supportive services are among the most common services provided in conjunction with local schools. Previously, the State has trained local staff and regions on the incorporation of SCANS skills into work-based

learning activity. This has been successfully carried over to continue WIA over the last five years, allowing for the expansion of local capacity for reinforcing the connection between academic and occupational learning.

Employability training (pre-employment/work maturity skills training) has always been and continues as a staple among the menu of services by workforce development system partners. Linkages with the One Stop system and School-To-Work activities that have been sustained locally strengthen service provider efforts directed toward making connections for participants with the employer base across the state.

Work experience had been a mainstay of summer employment opportunities for at-risk youth throughout JTPA, and like employability training, still continues under WIA. An increased emphasis has been placed upon project-based learning integrating SCANS skills and competencies and leadership development opportunities on a year-round basis.

Vocational training continues to be available at both the secondary and postsecondary level through public and private schools, as well as through a variety of community based organizations across the state, all of whom are active partners in the workforce investment system.

Mentoring programs have been institutionalized into the WIA menu of youth services. Soon after WIA was implemented, specific training in this area was provided to local providers in order to expand the workforce development system' ability to offer this service. As indicated in Section VI.F, the State has required that local areas take steps to ensure that mentoring efforts offer mentors and mentees maximum protection and quality experiences through appropriate screening and training of mentors and through the provision of ongoing support for mentoring activities.

Local areas have relied heavily on WIA service providers and their coordination with other community resources in order that they may continue to provide the necessary guidance and counseling, supportive services, and follow-up contacts to help participants sustain gains made during program participation. Guidance and counseling is available through WIA providers, the Department of Health & Welfare Substance Abuse program, Wagner-Peyser programs, the Idaho Division of Vocational Rehabilitation, the Idaho Commission on Aging, secondary and postsecondary technical colleges, private providers and a host of community based organizations. Individuals may choose to receive this service in-house or be referred to a more appropriate source.

Follow-up services have generally focused on continued contact with participants through both formal and informal channels designed to help participants sustain gains made during program participation. This may take the form of coaching and trouble-shooting on the job, coordinating with school staff to further participant goals in educational settings, and general support based on individual needs.

- F. *Business Services. (§§112 (a) and 112(b)(2).) Provide a description of the state's strategies to improve the services to employers, including a description of how the State intends to:*

1. *Determine the employer needs in the local areas and on a Statewide basis.*

The employer community is a valued and important customer of the One Stop system. The Workforce Development Council lists as its first goal the routine

collection of data from employers to ensure a demand driven workforce system. As new members have been added to the Council, a deliberate effort was made to seek nominees from important industry sectors to ensure on-going communication; this is a practice that will be continued as business members are added to the Council. The Council and their one stop system seek employer input in a variety of means:

- Regional Labor Economists routinely identify and publish regional business activity to assist front line staff in targeting employer needs.
- Special surveys have been conducted to identify skills needs of employers. This was originally funded as a pilot by the Workforce Development Council using 15% funds and was expanded statewide in 2005.
- The Workforce Development Council is overseeing a project begun by the Policy Academy to improve workforce supply-demand information.
- Business Industry Consortia were started under a grant from incentive dollars and were continued with local and state 15% funds. Existing BICs will be continued and new committees formed as funding permits.
- One stop centers and training programs in the postsecondary system host employer committees to advise on service delivery.
- The development of career clusters will aid in communication among business and the workforce, education and economic development system.

To assure staff is viewed as an asset by the employer community, statewide staff training was provided to increase staff capacity to meet employer needs. This training has been incorporated into the CDF training made available to staff and provides line staff a mechanism to focus efforts to improve services to both employer and job seeking customers, thereby enhancing the quality of job listings and improving customer satisfaction.

The evolution of technology tools to assist staff to better serve employer needs will continue to be a priority item in the One Stop Career Center delivery system. A server based employer portfolio has been implemented statewide to provide staff with specialized information to improve employer services. These enhancements include a data base of services provided to employers and a much improved integration of data at the state level. Other enhancements to this system will provide the opportunity to better describe job requirements to improve recruitment effectiveness, the use of the Standard Occupational Classification system to replace the antiquated Dictionary of Occupational Titles coding structure, and improved capabilities to match employer needs with qualified applicant

2. *Integrate business services, including Wagner-Peyser Act services, to employers through the One-Stop system.*

The Idaho Department of Commerce and Labor has fully committed to the development of the One Stop system in Idaho and will offer all of its programs through the system. These include Wagner-Peyser, Unemployment Insurance, Trade Adjustment Assistance, Jobs for Veterans (LVER/DVOP) and employment and training assistance, and a host of cost reimbursable grants including WOTC and W2W Tax Credits, LMI, H2A, and other special grants as well as a state funded training program. The merger of the Department of Commerce with Labor created an opportunity to disseminate the agency's economic and community development services through the one stop system. Training is planned for PY'05 to enhance the

capacity of all one stop centers to deliver the full range of economic and community development services.

Wagner-Peyser funds have been used to operate the state's primary labor exchange for a number of years. While partners often do their own job development, the Wagner-Peyser Employment Service System has been a referral point for all work ready participants about to exit program services. One Stop funds were used to make job registration and job listing services more accessible to partners and their clients. Now, customers can utilize this service at any partner location or over the Internet. This assures broad use of the system by all partners and eliminates the need to create alternative systems. The labor exchange self-registration and job search systems are being made available to all partners and will not be duplicated.

3. *Streamline administration of Federal tax credit programs within the One-Stop system to maximize employer participation? (20 CFR part 652.3(b), §112(b)(17)(A)(i).)*

The Work Opportunity Tax Credit (WOTC) and Welfare to Work Tax Credit programs are administered by Idaho Commerce and Labor. Program information is made available to employers and the public through direct marketing, brochures, and electronically through the Idaho Commerce and Labor website. Promotional brochures and informational packets are made available through the One Stop Career Centers and system partners for direct marketing purposes during job development and placement activities by service delivery staff. Idaho Commerce and Labor includes the tax credit programs in its One Stop cooperative agreements and that is very beneficial in assisting in marketing efforts for the tax credit programs. Idaho Commerce and Labor Tax Credit staff provides training when needed for staff of partner agencies and organizations to expand the utilization of the tax credit programs. All Tax Credit documents submitted by Idaho employers, including related certifications and other written communication, are processed in the Idaho Commerce and Labor Central Office.

G. *Innovative Service Delivery Strategies (§112(b)(17)(A).)*

1. *Describe innovative service delivery strategies the State has or is planning to undertake to maximize resources, increase service levels, improve service quality, achieve better integration or meet other key State goals. Include in the description the initiative's general design, anticipated outcomes, partners involved and funds leveraged (e.g., Title I formula, Statewide reserve, employer contributions, education funds, non-WIA State funds).*

Throughout this document, the state has described strategies we believe will yield the positive results suggested in this section. Among the projects are those described as the states priorities in Section II of this plan. These include plans to:

- Eliminate duplicative administrative systems and maximize opportunities for training.
- Continue Transformation into a Demand Driven System.
- Enhance Integration of the One Stop System.
- Refocus Youth Investments.
- Implement Reporting for Common Measures and Strengthen accountability.
- Improve Workforce Information.
- Assure a quality pre-K-16 plus system of education and training
- Promote Flexible Workplaces
- Create an Entrepreneurial Workforce.

- Expand awareness of the Workforce System

Additional strategies that have been described in this plan and chronicled in a report on the state's business services include:

- Pilots that share resources of the workforce and education system with business to expand training in high growth industries;
- Extensive staff training to meet needs of customers and businesses;
- Specialized labor market studies to identify skills gaps and partnerships
- Development of career clusters to guide workforce, economic development and education;
- A Business Relations Strategy that incorporates staff training and focus on business as the system's first customer;
- Pilots to identify and offer intensive services to business;
- The use of the state's Workforce Development Training Fund to build the skills of workers in new and expanding industries;
- Extensive use of technology to reach employers and workers alike and joint partnerships with business to manage recruitment;
- Extensive building/remodeling of facilities to provide special facilities for business; and
- Intensive labor exchange practices tied to business recruitment and expansion.

2. *If your States participating in the ETA Personal Re-employment Account (PRA) demonstration, describe your vision for integrating PRAs as a service delivery alternative as part of the State's overall strategy for workforce investment.*

Idaho is fortunate to be a participant in the PRA demonstration. The program is being operated in two One Stop centers selected because of the higher than average unemployment in one center and lower than average unemployment in the second. The demonstration will allow the state to determine whether the PRA program should be provided as an opportunity statewide under the WIA program when it is reauthorized. Information will be gathered on a wide variety of demographic, occupational and economic data so that the state can carefully structure any future PRA opportunities.

- H. *Strategies for Faith-based and Community Organizations (§112(b)(17)(i).) – Enhancing outreach opportunities to those most in need is a fundamental element of the demand-driven systems goal to increase the pipeline of needed workers while meeting the training and employment needs of those most at risk. Faith-based and community organizations provide unique opportunities for the workforce investment system to access this pool of workers and meet the needs of business and industry. Describe those activities to be undertaken to: (1) increase the opportunities for participation of faith-based and community organizations as committed and active partners in the One-Stop delivery system; and (2) expand the access of faith-based and community-based organizations' clients and customers to the services offered by the One-Stops in the State. Outline those action steps designed to strengthen State collaboration efforts with local workforce investment areas in conducting outreach campaigns to educate faith-based and community organizations about the attributes and objectives of the demand-driven workforce investment system. Indicate how these resources can be strategically and effectively leveraged in the State's workforce investment areas to help meet the objectives of the Workforce Investment Act.*

In 2003, the Governor's office convened a group of several representatives of faith- and community-based organizations (FBCO) and representatives of state agencies to determine the effort currently being made in incorporating FBCOs as working service partners in the state. The results of a strength, weaknesses, opportunities, and threat

(SWOT) analysis showed that the state had made inroads in doing so. Each key state agency had established a position to coordinate FBCO's interests and efforts to assist in providing services throughout the state to the underserved, and noted that the state's workforce development system has had several FBCOs apply and receive grants to operate as WIA service providers within the state for several years.

As a means of enhancing outreach opportunities to those most in need, the State is examining the potential for increasing the participation of FBCOs as committed and active partners in the One-Stop delivery system. An initiative will be implemented to market the system to instill awareness of the resources available through the workforce development system. Included as part of this effort would be the expansion of access to FBCOs' clients and customers to the services offered by the State's One-Stop system.

The State will make an extensive effort to expand universal access to program information and funding throughout the state, to include service opportunities for FBCOs, especially for those that have demonstrated a successful ability in forming partnerships and providing services to those most in need.

X. *State Administration*

- A. *What technology infrastructure and/or management information systems does the State have in place to support the State and local workforce investment activities such as a One-Stop operating system designed to facilitate case management and service delivery across programs, a State job matching system, web-based self service tools for customers, fiscal management systems, etc.? (§§111(d)(2), 112(b)(1) and 112(b)(8)(B).)*

The State has invested heavily in using technology to expand the services provided to its customers as well as the tools available to staff to improve their effectiveness and efficiency. As with improvement of facilities, much of the progress in technology was made possible by creatively using a variety of grant funds and supplemental funding sources to achieve the desired results.

Hi-tech lobbies were initially installed in local offices across the state in 1995/96 with the help of the Federal One-Stop grant and the State's Special Administration Fund. In 2003, the State was able to upgrade/replace all the lobby computers using a portion of the Reed Act funds that were distributed back to all states by the U.S. Department of Labor.

Without a doubt, the most significant technology development for the State's workforce system has been the IdahoWorks information system. This is a comprehensive system used to deliver a variety of unemployment insurance (UI) and employment and training services throughout the state. The system's internet-based design was initiated in 1995 using One-Stop grant funds and it has continued to evolve and grow in scope since that time. IdahoWorks is constructed using internet technologies thus allowing it to be used both internally in one stop offices and partner sites and externally by customers over the internet. The user interfaces are standardized across programs thus maximizing ease of use and overall satisfaction for both staff and customers. The largely self-service aspect of the system has greatly increased the number of customers who obtain service and frees up staff to help those with special needs. The State believes that the system provides substantial savings when compared to traditional approaches.

The IdahoWorks system combines a full array of unemployment insurance, labor exchange, and training programs within one system that meets the needs of both job seeker and business customers. Job seekers and UI claimants use the system to file initial and continuing claims for unemployment insurance, register for work, scan available jobs, obtain information about available training programs, and search an extensive array of labor market and career information. Businesses can use the on-line system for reporting wages and filing UI taxes, as well as accessing labor market information and an extensive body of related information on topics such as business expansion, tax credits, and employment services.

IdahoWorks serves as the One-Stop information system for the Workforce Investment Act in Idaho and has been used by all workforce investment areas for case management, program management, financial management, federal reporting, etc. The system has extensive edits, data quality prompts to remind case managers that data needs to be reviewed or updated and a wealth of information used for management. While the simplicity of data entry is a hallmark of the system, the wide range of program, performance and financial information available at the touch of a button has created a comprehensive management system that allows users at all levels to easily identify and address both client and program management issues.

Uniquely, IdahoWorks also houses the State's Human Resource System as a system component. In 2002, ICL partnered with the Division of Human Resources (DHR) to design a system that includes on-line job announcements, on-line applications, on-line

testing, and on-line hiring registers. In the first year of operation, the system took 72,000 applications for state jobs from 31,000 people.

The Unemployment Insurance Internet Claims System, the Job Seeker Registration System, and the State's Human Resource System have each received Information Technology Achievement awards from Idaho's Information Technology Resource Management Council. The UI Internet Claims System was also recognized by the National Association of State Workforce Agencies.

In mid-2004, ICL further enhanced its business services when it rolled out a new Employer Job Entry (EJoE) system that allows employers to write, enter and manage their own job listings. Employers control how the job seekers contact them from the job posting. Through the system, they can also review lists of candidates who have inquired about a job listing and screen applicant profiles and resumes. Self-posting is optional and Employment Consultants in the local office are available to help businesses, as needed, to write good job descriptions and/or navigate the system. This system has been received very positively in the short period since its launch.

More recently, in response to the medical community's special need to recruit employees, Commerce and Labor used its technological expertise to develop customized electronic job listing/resume posting systems for the Idaho Hospital Association. The customized job bank provides a simple process for member businesses to post their jobs and for job seekers to post their resumes.

Many businesses probably view Unemployment Insurance more as a tax requirement than a service provided for their benefit. However, the program requires extensive interaction between the agency and individual businesses, and each contact provides a service opportunity that can affect the general relationship between ICL and the business. Over the years, the Department of Labor used both technology and the human touch to improve its customer relationship. As noted previously, employers were recently provided the option to report wages and file taxes through IdahoWorks. On the more human side, and as a means to improve decisions for UI eligibility, local office staff now telephone employers directly to obtain information related to employee separation thus achieving better response and better decisions. At the same time, extensive document imaging (becoming paperless) provides the agency with more opportunities to conduct quality control reviews of records. The agency strives to be "number one" in the quality of its UI decisions, as that helps build the confidence and support of business in the overall agency.

Labor market information is another customer service that has helped workers and business benefit significantly from the agency's commitment to technology. Idaho's Labor Market Information (iLMI) website helps businesses make decisions that may be related to a wide variety of issues including availability of skilled workers, pay and benefits by occupations, economic profile of the state and counties, area demographics, industry growth and composition, and number of workers by occupation. During PY 2003, the iLMI website experienced 117,525 visits comprising well over 1,100,000 hits. Customer interest in iLMI is continuing to grow. The agency conducts continuous analysis of website usage as well as customer feedback to keep the site up-to-date with data, reports, and publications that are in demand.

B. Describe the State's plan for use of the funds reserved for Statewide activities under WIA §128 (a)(1).

The funds have been primarily used to support systems necessary for operation of the workforce investment system with limited funding available for discretionary activities. Priority for PY'05 will be to fund mandatory activities and commitments made for high

growth projects initiated in PY'04 and designed to continue into PY'05. Priority for PY'06 will continue with the same priorities with the addition of a reserve for unmet needs and/or a small reserve to be used for transition into a leaner PY'07 budget cycle. Attachment 16 reflects plans for use of Statewide funds for PY'05, while Attachment 16-06 reflects plans for PY'06.

- C. *Describe how any waivers or workflex authority (both existing and planned) will assist the State in developing its workforce investment system. (§§189(i)(1), 189 (i)(4)(A), and 192).)*

Eligible Provider List:

As noted earlier in this Plan under Section V. Item J., the State of Idaho is seeking an extension of its current waiver on the Time Limit of the Period of Initial Eligibility for Training Providers. An extension of this provision will assist the State in the continuation and development of its workforce investment system in a variety of ways.

The state's training providers have expressed strong concerns with the implementation of subsequent eligibility requirements. By continuing the waiver extension, Idaho can be assured of maintaining a comprehensive eligible training provider list, allowing program participants the opportunity to select their choice of providers. The State is committed to delivering quality employment and training programs under WIA, which can only be provided by allowing participants to choose from a plethora of eligible training providers and their programs, which is currently available on the State's ETP list. However, it is very likely that if the waiver is not extended, the implementation of the subsequent eligibility criteria will prevent providers from participating in WIA and deny the state the ability to continue to provide the broadest range of training options for its WIA participants.

Single State Board:

The State is proposing designation of two workforce areas, development of a single regional plan for the single statewide regional planning area, and establishing a consortium of the two areas to conduct business using a single administrative agency. As part of this plan, Idaho is requesting a waiver to apply 20 CFR 661.300(f) which permits the state board to carryout the roles of a local board in a single area state, to a single statewide planning area. The waiver will allow functioning of the state as a single workforce planning area governed by a single board. This will allow the state to meet many of the goals outlined in section II of this plan including:

- The redirection of funding from planning and duplicative administrative systems to training;
- Expanded opportunities to align and integrate workforce development, economic development and education policy and services;
- Expansion of service access through development of a more comprehensive one stop system; and
- Increased efficiency in administration and operation of the system.

Performance Measure Transition to Common Measures:

The State is proposing to adopt and report on the six common measures in lieu of the existing 17 WIA performance measures. The state would like to implement this change at the beginning of the 2006 Program Year (July 2006), coinciding with implementation of these measures for the state's Wagner-Peyser, Jobs for Veterans Act and Trade Adjustment Act programs. This waiver should help to strengthen the state's ability to assess its statewide workforce development system.

With the shift to the six standards under common measures, Idaho would achieve the following goals:

- a. Eliminate duplicative administrative systems which will reduce paperwork and labor costs associated with redundant data collection.*
- b. Enhance integration of the One Stop System by use of a single measurement system to test performance.*
- c. Refocus youth investments by creating opportunities to better implement the USDOL's Strategic Vision for Services to Youth, by focusing on out-of-school populations with increased accountability for employment and/or increased secondary and postsecondary education outcomes.*

Cost savings through streamlining. A simplified and streamlined performance measurement system is more cost effective, allowing for program resources to be directed to a single set of goals, rather than competing goals and costly processes.

D. Performance Management and Accountability. Improved performance and accountability for customer-focused results are central features of WIA. To improve, states need not only systems in place to collect data and track performance, but also systems to analyze the information and modify strategies to improve performance. (See Training and Employment Guidance Letter (TEGL) 15-03, Common Measures Policy, December 10, 2003.) In this section, describe how the State measures the success of its strategies in achieving its goals, and how the State uses this data to continuously improve the system.

- 1. Describe the State's performance accountability system, including any state-system measures and the state's performance goals established with local areas. Identify the performance indicators and goals the State has established to track its progress toward meeting its strategic goals and implementing its vision for the workforce investment system. For each of the core indicators, explain how the State worked with local boards to determine the level of the performance goals. Include a discussion of how the levels compare with the State's previous outcomes as well as with the State-adjusted levels of performance established for other States (if available), taking into account differences in economic conditions, the characteristics of participants when they entered the program and the services to be provided. Include a description of how the levels will help the State achieve continuous improvement over the two years of the Plan. (§§112(b)(3) and 136(b)(3).)*

Idaho currently utilizes the 17 WIA core measures and will adjust those to incorporate the Common Measures to track performance within the system. The State also utilizes a system of interim indicators to provide a base for oversight and continuous improvement at the regional and service provider level. While these are not formal "measures", they are critical to the state's achievement of the formal measures since they can be used on a real time basis to test progress or identify potential issues. The State has followed USDOL guidance in establishing performance goals for each of the 17 core measures, some of which have been amended to include Common Measures. The State has developed a database for the 17 WIA core measures in accordance with federal guidance and is in development of the same for the Common Measures. The current database reflects past State and area-level performance and be used as the primary basis for negotiations with the USDOL for determining proposed levels of performance for these measures. The 17 measures and performance levels are attached (see Attachment 11).

In developing the performance expectations, the State has considered factors such as economic conditions, the characteristics of participants and the services to be provided. The State has also committed to working closely with the local providers in identifying significant changes in the factors used to develop

performance levels and negotiating the appropriate revisions at both the federal and local levels.

Idaho has always believed that it is critical to closely monitor the appropriateness of the core measurement system to avoid unintended negative impacts on service delivery strategies. The state's service providers need assurance that the WIA measures system will not inadvertently create barriers to quality services. Accordingly, the State has worked closely with the local areas to identify potential problems early and to make the appropriate adjustments in performance expectations.

As described above and as evidenced by its previous performance achievement levels, Idaho has always closely monitored the WIA performance system and performance expectations to ensure that they contribute to quality service delivery. Meeting and exceeding appropriate performance levels have required comprehensive quality services that contribute to a high level of customer satisfaction. This emphasis on performance accountability helps promote continuous improvement.

Also, as part of an overall effort to determine the performance and progress of the state's workforce development system, the State Workforce Development Council invited a leading national expert in performance management and measurement to share insights with it on state of the art measurement systems across the country. The Council requested that state staff research options for measuring the State's workforce system efforts, utilizing the guiding principles it had established several years ago. State staff convened a group of Idaho's system partners to discuss its findings and determine an appropriate course of action. A three-tiered approach to system measures was seen as appropriate, utilizing individual program measures in the first tier, Common Measures in the second tier, with the last tier intended to portray system progress beyond the earlier categorical program results through a limited number of indicators that will measure progress on the Council's highest priority goals. The State plans to consider the Integrated Performance Information project sponsored by the National Governors' Association as a potential option for establishing system measures.

2. *Describe any targeted applicant groups under WIA Title I, the Wagner-Peyser Act or Title 38 Chapters 41 and 42 (Veterans Employment and Training Programs) that the State tracks. (§§111(d)(2), 112(b)(3) and 136(b)(2)(C).)*

The state routinely monitors services under Title I, Wagner-Peyser and VETS to track all mandated priority groups. Tracking is available through the state's IdahoWorks management information systems. In WIA Title I, the MIS allows for tracking of enrollments and outcome for a variety of demographic, education, economic and social characteristics to ensure equity of service to the groups with special attention to those groups targeted in the legislation—public assistance recipients, veterans, individuals with disabilities and older individuals as well as displaced homemakers in the dislocated worker program. In the youth programs, special tracking is done for public assistance recipients, veterans, individuals with disabilities and out-of-school youth. These are available on a real time basis reflecting enrollments, exits and outcomes reported for interim indicators.

The Wagner-Peyser Management Information Report tracks services to veterans, MSFWs and individuals with disabilities. This is also available as an on-line report.

3. *Identify any performance outcomes or measures in addition to those prescribed by WIA and what process is the State using to track and report them?*

As indicated above, the state uses a process of interim indicators to manage performance under Title IB programs. These include such indicators as placement at exit, wage rate at exit and youth indicators as well as fund utilization and economic and demographic characteristics of enrollees. These allow the state and its service providers to maintain real time access to progress and financial information, allowing corrective action to occur during the program year. These are available on line to anyone with security access to the WIA system. Significant information is also available on client progress and fund utilization to aid in managing the case load.

4. *Describe the State's common data system and reporting processes in place to track progress. Describe what data will be collected from the various One-Stop partners (beyond that required by DOL), use of quarterly wage records (including how your State accesses wage records), and how the Statewide system will have access to the information needed to continuously improve. (§112(b)(8)(B).)*

Idaho will operate a statewide management information system and financial payment system. All WIA Adult, Dislocated Worker and Youth service providers will use these automated systems. These systems offer capability to closely monitor and manage Individual Training Accounts usage. The automated MIS and financial system will allow for ongoing reporting on amount of expenditures by each training provider. This system will help ensure that payment and tracking methods are easily accessible at the local level and will encourage the utilization of ITAs. The statewide systems will also help ensure quality performance reporting.

Continuous improvement endeavors require access to performance data as well as customer satisfaction information. Idaho's WIA MIS Internet system provides the online user with a number of ad hoc reporting options ~ demographic/programmatic/accounting data related to active participants or completers; data collected during follow-up; required federal reports, including performance data based on quarterly wage records. Ad hoc reporting allows the user to access data at all levels ~ State, local area, service provider, or participant. Customer satisfaction survey response data is also housed within the WIA MIS, and can be viewed using the reporting system.

Idaho is committed to obtaining customer input on service delivery and increasing customer satisfaction. All programs are encouraged to utilize a wide variety of methods to obtain customer feedback ranging from simply listening to customers to formal surveys.

The Department of Commerce and Labor obtains employer feedback through ICL Employer Committees, Small Business Information Fairs, employer input surveys and focus groups. For example, when the Department established Employer Resource Centers in each of the offices, 200 employers were surveyed to identify the resources they would find the most useful. Based on this feedback, informational materials have been developed and are available in printed version or on the Department's web site.

The Department also conducts employer surveys to determine satisfaction with placement services. The surveys are contracted to a third party and are statistically valid for each local office. The current statewide survey effort

includes the three WIA employer satisfaction questions and rating scale. Based on previous survey results, the Department provided guidance to staff on how to improve applicant screening techniques. Also, a new job match system is being developed that will provide frontline staff with a better tool for identifying the most appropriate job seeker to fill the employer's job opening.

The Department also utilizes a variety of methods to obtain job seeker input. These methods include surveys, comment cards, direct feedback, Labor/Management Committees and Internet e-mail. The *Idaho Works* system also includes an automated user friendly survey that measures satisfaction with local office staff, services, self-registration process, the job search system and resource center services. Through the Internet e-mail customers have access to the Director, management staff and program experts. Recent comments received through this dynamic system have lead to improvements in the menu selections for accessing job order information and in the process for receiving applications for State employment.

The statewide WIA management information system will provide the capability of analyzing the WIA customer satisfaction surveys by participant groups. The WIA customer satisfaction survey will be enhanced to include employment related feedback. This will greatly increase the usefulness of the data for continuous improvement efforts. The statewide management information system allows broad local access to this information.

The state cross-matches files from the WIA MIS and IdahoWorks Wagner Peyser system to the Unemployment Insurance wage record system. The state has been a long time participant in the WRIS system, both providing and accessing data nationally. Agreements are also in place with the state's education system, Vocational Rehabilitation and the Commission for the Blind and Visually impaired to cross match files against the wage record system to establish employment and earnings for those programs.

5. *Describe any actions the Governor and State Board will take to ensure collaboration with key partners and continuous improvement of the statewide workforce investment system. (§§111(d)(2) and 112(b)(1).)*

The State Board have assigned key state agencies the responsibility for developing system measures to test the overall effectiveness of the workforce system. These are described in section X.D.1.

6. *How do the State and local boards evaluate performance? What corrective actions (including sanctions and technical assistance) will the State take if performance falls short of expectations? How will the Boards use the review process to reinforce the strategic direction of the system? (§§111(d)(2), 112(b)(1), and 112(b)(3).)*

The State and Workforce Development Council have been involved in an ongoing evaluation of program performance. The State's WIA management information system (WIA MIS) and the WIA customer satisfaction surveys will be the primary tools used to measure performance. The State's Incentive and Sanction policies will be based on the seventeen WIA core performance measures.

The State and the WDC reviews performance on at least a quarterly basis. State staff is involved in the technical assistance efforts to improve service delivery. State staff meet regularly with service providers to assess opportunities for

service improvements including program collaboration efforts and cross training of frontline staff. Possible sanctions range from modifying service provider contracts to reductions of funding or terminations of contracts.

The State and local performance system is based on a commitment to ongoing capacity building and the creation of a continuously improving quality delivery system. The State will utilize the WIA 15% resources to finance consultants, training conferences, or other activities to build the capacity of the workforce investment system. Local service providers will be polled to determine specific needs for training and assistance and will be included in determining the specific use of the funds. The State will also direct capacity building and technical assistance to those areas that are failing to meet performance standards. Capacity building efforts will be closely coordinated with the USDOL's technical assistance activities.

As funding allows, the State will allocate a portion of the WIA State-level budget to local areas as incentive funds to reward exemplary local experience. During PY'05, no performance incentives will be awarded for performance during PY'04. Rather, an incentive award will be made to recognize efficiencies created by streamlining of the system into a single workforce planning region.

During PY'06, funding for incentives will be made available with an amount to be determined by the Workforce Council after considering other needs for the declining pool of state 15% funds. The State Workforce Development Council approved a new process for determining local eligibility for incentive funds. The formula requires an overall demonstration of good performance by stipulating that only those local areas achieving a minimum of 80% of the negotiated benchmark on at least 15 of the 17 measures would be eligible for incentive funds. The incentive pool would be divided into 17 equal portions, each tied to a specific performance measure. Eligible regions that meet or exceed each measure would divide the pool attached to that measure equally. This process helps to ensure that regions are recognized for achievements made in those areas in which they excelled and penalized only for those measures in which they failed to achieve the standard. It also affords each region increased access to at least some portion of the incentive funds available to that region. By incentivizing acceptable performance both in the aggregate and on each individual measure, the state's prospects for meeting federal requirements for program grouping performance would be enhanced; there is, however, still some concern that the state could miss program grouping standards if multiple regions performed poorly on the same measures. Despite this concern, Idaho's historical performance shows that possibility to be highly unlikely.

Idaho's sanction policies will apply to those areas that fail to achieve the performance levels noted above. Levels will be established for each separate program, as well as the customer satisfaction. The lowest acceptable level (*lower limit*) will be calculated as 80% of the local areas negotiated level. Local areas must attain 80% of the targeted performance level on each measure for performance to be determined acceptable. For the first year, a local area will be required to submit a performance improvement plan addressing the areas of under-performance. The Idaho Department of Commerce and Labor will provide technical assistance to the area in developing the plan. If a local area has unacceptable performance for two consecutive years, the Governor will take corrective action. The corrective action may include prohibiting the use of particular service providers or One Stop partners that have been identified as achieving poor levels of performance, or require other appropriate measures

designed to improve performance of the local area. Appeal processes will be available in accordance with federal law and regulations.

7. *What steps, if any, has the State taken to prepare for implementation of new reporting requirements against the common performance measures as described in Training and Employment Guidance Letter (TEGL), 15-03, December 10, 2003, Common Measures Policy. NOTE: ETA will issue additional guidance on reporting requirements for common measures.*

Idaho manages a statewide management information and financial payment system that is utilized by all WIA Adult, Youth, and Dislocated Worker service providers. Commerce and Labor Information Systems staff have already begun to collect younger youth wages, both 1st quarter after exit wages for the Placement in Employment or Education common measure, as well as 2nd quarter post exit wages for the Employment Retention Rate common measure. Every effort will be made to collect data necessary to calculate performance under the youth Literacy and Numeracy Gains common measure by July 1, 2005. Additionally, State staff has regular meetings to discuss progress for collection of data necessary to meet Common Measures guidelines. The data we are not yet collecting, however, are very minimal. Idaho fully expects to be collecting all elements necessary to meet the requirements of Common Measures by July 1, 2005.

8. *Include a proposed level for each performance measure for each of the two program years covered by the Plan. While the plan is under review, the State will negotiate with the respective ETA Regional Administrator to set the appropriate levels for the next two years. At a minimum, states must identify the performance indicators required under section 136, and, for each indicator, the State must develop an objective and quantifiable performance goal for two program years. States are encouraged to address how the performance goals for local workforce investment areas and training provides will help them attain their Statewide performance goals. (§§112(b)(3) and 136.)*

Idaho's planned performance measures are in Attachment 11. These measures cover PY 2005 and PY 2006.

The planned performance levels were derived by considering the state's historical performance, the measure's definition and numerical components. The planned performance levels will be negotiated with the US Dept. of Labor, Employment and Training Administration (ETA). ETA prepared an analysis of states' performance outcomes and compiled various comparative tables and rankings. Using those tables, Idaho's planned performance measures and rationale are as follows.

Adult

Entered Employment Rate; proposed goal – 87%

The State of Idaho's proposed goal is equivalent to program year 2003 performance for the top 10% of the States. Program Year 2004 ytd entered employment rate is currently at 86.4%.

Employment Retention Rate @ Six Months; proposed goal – 84%

The proposed goal is 84%, which is equivalent to the median value of the States performance over the past three program years and is in the 85th national percentile. Considering the potential for large layoffs in high-tech industries and general economic disruptions caused by the expected drought (now 6 to 7 years

in duration), we believe that the proposed goal is a reasonable goal for this measure.

Average Earnings Change in Six Months; proposed goal - \$3900

The proposed goal exceeds the 75th percentile for all States in this category as indicated in the program year 2003 national distribution of performance outcomes (\$3,820). Idaho is a relatively low-wage state. Currently, Idaho ranks 39th in average wages among the 50 states. Idaho's average weekly wage for 2003 (latest annual data available) was \$551 as compared to the national average of \$726. Therefore, earning capacity greater than the proposed goal for our WIA Adult exiters are limited.

Idaho's average wage rates do not increase as fast as the nation's. Between 2002 and 2003, the national average wage rate increased by 2.69 percent while Idaho's increased by only 1.66 percent. This difference is further magnified by the fact the national average wage base is significantly higher than Idaho's. There are other economic factors affecting the Average Earnings Change. The state's minimum wage is the federal minimum wage. A high population growth rate does not always translate into higher wage rates even though the number of jobs will increase as Idaho's labor supply/demand ratio has not been distorted by the growth. Manufacturing is a small percentage of the total number of jobs and Manufacturing jobs are generally higher paying than services jobs. Finally, there still is considerable seasonality associated with Idaho's agricultural and natural resources industries.

Employment and Credential Rate; proposed goal – 70% (PY '05) and 73% (PY '06)

Idaho proposes this goal to be at a rate that is in the 80th percentile for program year 2005 and to raise it to 73% the following program year, which is in the 85th percentile. The proposed goal for PY '05 is equivalent to the median value of Idaho's performance over the past three program years. Because it is too late to influence this measure due to the reporting period (10/04 – 9/05) for this measure for program year 2005, we propose to raise it to 73% the following program year by focusing attention to record keeping. We currently are in the process of implementing a data quality report as a reminder for case managers to collect and report credentials. Additionally, as indicated in this Plan, Idaho's goal is to increase the number of participants in training which should have a positive effect on the outcomes for this measure.

Dislocated Worker

Entered Employment Rate; proposed goal – 90%

The State of Idaho's proposed goal is in the top 10% of the States.

Employment Retention Rate @ Six Months; proposed goal – 91%

The State of Idaho's proposed goal is in the top 10% of the States.

Average Earnings Change in Six Months; proposed goal – -\$1500 / 88%

The discussion about the Average Earnings Change for adult programs also applies to this measure. There are some additional economic factors that apply to this measure for dislocated workers.

Idaho proposal puts us in the 50th percentile of states for this measure. One-half of the states experienced a dislocated workers earnings replacement rate of less than 100 percent. This has been Idaho's experience throughout WIA and is due to the fact that so many of Idaho dislocated workers have lost jobs in declining

industries and most of these jobs were high-paying ones in mining, wood products industries, chemical and other durable goods manufacturing, food processing, railroads, and, more recently, electronics and federal government. Comparable replacement jobs are in short supply in these industries and the Service-Providing Industries do not pay as much.

Employment and Credential Rate; proposed goal – 72% (PY '05) and 74% (PY '06)

Idaho proposes this goal to be at a rate that is between the 65th and 70th percentile for program year 2005 and to raise it to 74% the following program year, which is in the 80th percentile. The proposed goal for PY '05 is equivalent to the median value of the Idaho's performance over the past three program years. Outcomes for this particular measure have experienced pretty drastic swings. Though the current median between program years '01 – '03 is 72, the gaps in these figures between program years are quite wide. For example, program year 01's outcome was 62; PY '02 was 69.7, and PY '03 was 73.2. Because it is too late to influence this measure due to the reporting period (10/04 – 9/05) for this measure for program year 2005, we propose to raise it to 74% the following program year by focusing on improving training opportunities and better record keeping. As indicated in this Plan, Idaho's goal is to increase the number of participants in training which should have a positive effect on the outcomes for this measure. We also are in the process of implementing a data quality report as a reminder for case managers to collect and report credentials.

Older Youth

Entered Employment Rate; proposed goal – 83%

The State of Idaho's proposed goal is within the top 10% of the States for PY '03.

Employment Retention Rate @ Six Months; proposed goal – 89%

The proposed goal is only one percentage point under the program year 2003 90th percentile for all states. and falls between the 85th and 90th percentile.

Average Earnings Change in Six Months; proposed goal - \$3094

The proposed goal for this measure is equivalent to the median value of the States performance over the past three program years. Outcomes for this particular measure have experienced drastic swings between program years '02 and '03 and between '03 and ytd '04. Program year 02's outcome was \$4,020; PY '03 was \$2881, and ytd PY '04 is \$4500. Idaho proposal puts us in the 50th percentile of states for this measure.

The same factors that affect earnings change for adults and dislocated workers also contribute to this factor. However, the minimum wage aspect affects youth more than adults. Outside the urbanized areas of the state, the minimum wage is the norm as the starting wage for youth with little work experience. And, there is little economic or labor market pressure in these rural areas to change this condition as job opportunities are limited.

Credential Rate; proposed goal – 58% (PY '05) and 59% (PY '06)

The proposed goal for PY '05 is equivalent to the median value of the State's performance over the past three program years. This goal puts us between the 75th and 80th percentile for program year 2005 and we propose to raise it to 59% the following program year, which again is between the 75th and 80th percentile. Outcomes for this measure for program years '02 and '03 have been 56% and ytd PY '04 indicates we are at 52%. Because it is too late to influence this measure due to the reporting period (10/04 – 9/05) for this measure for program year 2005, we propose to raise it to 59% the following program year by focusing

on increasing training and improvements to record keeping. We currently are in the process of implementing a data quality report as a reminder for case managers to collect and report credentials. As indicated in this Plan, Idaho's goal is to increase the number of participants in training which should have a positive effect on the outcomes for this measure.

Younger Youth

Skill Attainment Rate; proposed goal – 92%

The proposed goal is only one percentage point under the program year 2003 national performance for this measure for the top 10% of states. This goal falls between the 85th and 90th percentile. Idaho's median value for performance over the past three program years is 91%.

Diploma or Equivalent Attainment; proposed goal – 77%

The proposed goal is only one percentage point under the program year 2003 national performance for this measure for the top 10% of states. It is .6 of a percentage point below the 85th percentile. Additionally, it is equivalent to the median value of the States performance over the past three program years. The most recent federal Quarterly Report indicates the outcome for this measure to be 77%. Past performance indicates outcomes for this measure to vary by 3 and 4 percentage points between program years.

Retention Rate; proposed goal – 78%

The State of Idaho's proposed goal for this measure is equivalent to that of the program year 2003 national performance for the top 10% of the states.

Customer Satisfaction

Participant customer satisfaction; proposed goal – 85%

The State of Idaho's proposed goal for this measure is equivalent to that of the program year 2003 national performance for the top 10% of the states.

Employer customer satisfaction; proposed goal – 85%

The State of Idaho's proposed goal for this measure is above that of the program year 2003 national performance for the top 10% of the states.

TABLE X.1

Average Weekly Wage--Covered Employment, All Industries, All Establishments						Idaho as a % of US An Avg	Percent Change
Idaho							
Year	Qtr1	Qtr2	Qtr3	Qtr4	Annual		
2001	526	524	527	558	534	76.6	
2002	534	527	536	569	542	76.7	1.50
2003	540	538	547	580	551	75.9	1.66
2004	552(P)	555(P)	569(P)				
United States							
Year	Qtr1	Qtr2	Qtr3	Qtr4	Annual		
2001	716	675	668	727	697		
2002	718	687	683	740	707		1.43
2003	730	702	705	768	726		2.69
2004	758(P)	724(P)	733(P)				
Source: US Bureau of Labor Statistics							

Table X.1 compares Idaho's average weekly wage to the nation's. Idaho's average weekly wage is barely three-fourths that of the nation. Between 2002 and 2003, the percentage increase in Idaho's annual average weekly wage a full percent less than the nations and the state's dollar increase was \$9 compared to \$19 for the nation.

There are not any existing reasons that would suddenly increase Idaho's average pay status relative to the nation. Therefore, Idaho considers is proposed performance measures to be reasonable and should be accepted by ETA.

The Idaho Workforce Development Council established a performance incentive award system that encourages the area and local program delivery system. Areas meeting the incentive award criteria have received additional program funds from the state set-aside funds. This incentive award system will be reviewed by the State Workforce Development Council during the transition year. It will be recommended that a system be instituted that reflects the new WIA structure.

E. Administrative Provisions

- 1. Provide a description of the appeals process referred to in §116(a)(5)(m).*

The State's appeal process may be found in Section VIII.A.3 of this plan..

- 2. Describe the steps taken by the State to ensure compliance with the non-discrimination requirements outlined in §188.*

State policy requires all one stop partners to make services available in a manner that complies with Section 188. The State provides information and support to local programs to ensure they are familiar with non-discrimination requirements. Details of these requirements can be found in the state's Methods of Administration at <http://cl.idaho.gov/wia1/moa2003.pdf>

Attachment #6-06

TRANSMITTAL #5

MEMORANDUM

May 4, 2006

TO: Workforce Development Council

FROM: Roger B. Madsen, Director

SUBJECT: One Stop Delivery System Policy Framework

ACTION REQUESTED: Adopt a revised policy framework for the One Stop system for implementation in the Statewide Regional Planning Area

BACKGROUND:

The Workforce Development Council has served as the primary governing body for the Idaho One Stop system since its inception. The passage of WIA signaled the change from Idaho's original voluntary one stop approach defined by the Council and system partners to a system governed by a very extensive legislative and regulatory framework. The reorganization to a single workforce planning area shifts responsibility for the detailed design of the system from the local Workforce Investment Boards to the Workforce Development Council. Ultimately, the local One Stop system will be defined by the Memoranda of Understanding (MOUs) between the One Stop partners and the WDC. At this time, the Council is being asked to define the policy framework that will guide development of these MOUs among partners and the Council.

Issues for Council deliberation are listed below together with the WIA legislative background and a general discussion of the current practices.

SYSTEM PARTNERS

WIA section 121(b)(1) identifies the entities that are required partners in the One Stop system. The "partners" are the entities that carry out the programs as the administering agency at the local level, not the subcontractor to that entity.

Attachment #1, page 3, lists the current mandatory and optional programs in the Idaho system under WIA. WIA legislation under consideration would expand the list to include Temporary Assistance for Needy Families (TANF) workforce programs as a mandatory program and would include a number of additional optional programs.

The primary issue is whether to mandate more extensive participation by voluntary partners than is required under WIA, to adopt the legislatively mandated framework or to offer other guidance.

Although the State has the option to mandate the participation of additional non-mandatory partners, a number of factors argue against such a move. First, the participation requirements are extensive for those designated as mandatory partners. Second, and perhaps more important, experience has demonstrated that mandates do little to achieve the goals of streamlined service or improved access. In fact, the cooperation that was achieved under a voluntary system was compromised when mandates were imposed. Therefore, staff recommends the following as a means to further goals:

Staff Recommendation #1:

That the Council encourage, but not mandate, the one stop partnership to seek out the participation of additional voluntary partners in the One Stop system.

PARTNER RESPONSIBILITIES

The regulations at sections 662.230 and 662.260 list the responsibilities of the mandatory partners. All required partners must make their applicable core services available in the One Stop Center and provide access to their other activities and programs. They must use a portion of their funds to create, maintain and participate in the One Stop delivery system and to provide their core services. They are required to enter into a Memorandum of Understanding (MOU) with the Workforce Development Council relating to the operation of the One Stop system.

The definition of a One Stop partner and “required” One Stop partner is sufficiently vague in the Act and regulations to raise questions about the application of various opportunities and requirements where these terms are used. Therefore, the following definitions are recommended to provide consistent guidance, adapted from current policies only for the shift in responsibility to the state level.

Staff Recommendation #2:

- 1. That a One Stop Partner is defined as the entity that serves as the administrative entity for one or more of the partner programs listed at WIA section 121(b)(1). It excludes subrecipients of these entities.**
- 2. That required One Stop Partners shall be defined as only those One Stop Partner entities which operate programs listed as required at 121(b)(1). All other partners are considered voluntary and are not subject to the requirements or opportunities afforded “required partners” unless agreed to by the partner, the Workforce Development Council and the Governor.**

After initial implementation of the One Stop system, the partners devised a methodology to share costs of operating the One Stop system. Where partners are located on a full-time basis, partners pay a fair share of space and operating costs based on their relative share of space occupied and services used. Separate co-location agreements are utilized to ensure that costs in each center are tailored to specific

circumstances of each partner and can meet audit standards. In cases where partners are in the One Stop system on a part-time or itinerant basis, partners agreed to allocate a fair share of the common space in a facility using the relative share of program participants utilizing the One Stop Center. A past pilot proved that costs for these visiting partners were “immaterial” for accounting purposes and no funds were required to change hands. It would be prudent to periodically test this to ensure that center partners are not unduly subsidizing costs of visiting partner programs.

Staff Recommendation #3:

- 1. That One Stop Partners who co-locate in a One Stop Center pay a proportionate share of costs for that Center and that such costs be determined as part of an agreement affixed to the Memorandum of Understanding.**
- 2. That One Stop Partners who “visit” the One Stop Center on a periodic basis, assume responsibility for a fair share of the common costs of the Center based on a pro-rata share of participants who use the Center. This shall be tested periodically. If costs are determined to be “immaterial”, no costs will be assessed except those that are the specific costs of the Partner.**

APPLICABLE CORE SERVICES

Required One Stop Partners must make their applicable core services for a program available in at least one One Stop Center in the Workforce Investment Area. The WIA already provides an extensive list of required services. A key consideration is that the WIA Strategic Plan adopted by the Governor as part of his reorganization called for expansion of the One Stop system to include access to the full range of economic development and community development services offered by Idaho Commerce & Labor as part of the menu of business services.

Staff Recommendation #4:

That the Council adopt the list of services specified in the WIA, require Idaho Commerce & Labor to provide information and access to its full range of services in the One Stop system and encourage, but not mandate, additional service elements in the development of the One Stop system.

LOCATION AND STRATEGY FOR PROVIDING SERVICES

The regulation at section 662.250 describes where and to what extent the One Stop partners must make available the applicable core services. Section 134(c) of WIA requires that the applicable core services be made available to individuals attributable to the partner program at the comprehensive One Stop Center.

The regulation at section 662.260 provides that, in addition to the provision of core services, the One Stop partners must use the One Stop system to provide access to the partners' other activities and programs. This access must be described in the MOU. This is intended to ensure a seamless,

comprehensive workforce development system that identifies the service options available to individuals and helps to facilitate access to these services.

State partners, those who report to a centralized administrative entity, have identified their applicable core services as those reflected in Attachment #2. In some cases, local entities operating these services on behalf of the partner may offer additional services. Those entities with only a “local” presence will identify their “applicable” core services during the process of negotiating the local MOU.

Additionally, the WIA Strategic Plan noted the Governor’s intent to ask the Council to designate all 24 Commerce & Labor offices as full service One Stop Centers. While Commerce & Labor offers a full range of required workforce services in each of their centers, they also offer access to Commerce & Labor’s economic and community development services. Idaho Commerce & Labor is asking the Council to endorse this configuration of centers as a basis for development of the MOU. While this meets the goal for expanded access to services in rural areas, it does not address the special challenges this expansion could pose for other partners.

Not all partners offer services at the current or proposed centers. Under WIA, the partner may provide core services at the center:

- Through the use of appropriate technology at the center;
- By co-locating personnel at the center;
- Cross-training of staff; or
- Through a cost-reimbursement or other agreement between center partners as agreed to in the MOU.

State partners have identified the methodology they would utilize as a minimum level of service to be negotiated in the MOU at the local level. This is reflected in Attachment #3.

Staff Recommendation #5:

- 1. That the Council support the Governor’s designation of the 24 Commerce & Labor offices as full service One Stop Centers, at least one in each region a “comprehensive” Center.**
- 2. That required One Stop Partners make applicable core services available and provide access to other services in at least one physical One Stop Center within each workforce region;**
- 3. That partners may utilize any authorized methodology to deliver core services provided the methodology**
 - **is consistent with the partner’s authorizing legislation and the WIA;**
 - **does not require the customer to travel to another location to obtain the core service; and**
 - **meets minimum standards of accessibility and non-discrimination set forth in section 188(a)(1) of the WIA.**
- 4. That access to other partner activities and programs be described in the MOU, and, at a minimum includes provision of information about partner programs and services in all One Stop Centers.**

ADDITIONAL SITES

In addition to the comprehensive centers, the regulation notes that WIA allows for three other arrangements to supplement the comprehensive center. These supplemental arrangements include:

- (1) a network of affiliated sites that can provide one or more of the programs, services and activities of the partners;
- (2) a network of One Stop partners through which each partner provides services that are linked, physically or technologically, to an affiliated site and through which all individuals are provided information on the availability of core services in the local area; and
- (3) specialized centers that address specific needs.

Under the current framework, the particular design, including the number of centers and other supplemental arrangements was identified as a process of negotiation of the MOU with the Workforce Investment Boards. The negotiation process now rests with the Council.

One Stop partners have an obligation to ensure that core services that are appropriate for their particular populations are made available at one comprehensive center. It is not required that partners provide applicable core services exclusively at a One Stop Center. Further, a partner is not required to route all of its participants through the comprehensive One Stop Center. If an individual enters the system through one of the network sites rather than the comprehensive One Stop Center, the individual may still obtain certain services at the network site and information about how and where all the other services provided through the One Stop system may be obtained.

The current framework includes a set of service standards for “affiliate partners” which are full off-site partners in the One Stop system. Essentially, these service standards mirror those for Centers, except that universal access and comprehensive service delivery of all required services do not apply.

The issue for the Council is whether to offer guidance to the system to ensure continuation of maximum access and consistent quality of that access.

Staff Recommendation #6:

- 1. That the Council encourage all required partners and voluntary partners to offer access to the services through the One Stop system by assuring an awareness of system services at any point of entry.**
- 2. That those partners wishing to be identified as “affiliate” partner sites will**
 - **enter into an MOU with the Workforce Development Council describing their specific participation in the One Stop system;**
 - **maintain access to the *IdahoWorks* automated system;**
 - **offer assisted services to those who prefer such services over automated services;****and**

- **make accurate and up-to-date information on their services available for access through *IdahoWorks*.**

ONE STOP OPERATORS – ELIGIBILITY TO BE DESIGNATED

The WIA introduces the concept of the One Stop Operator. The role of the One Stop Operator or Operators is to administer the One Stop Center(s). Their responsibility may range from simply coordinating service providers within the center to being the primary provider of services at the center. In areas where there is more than one comprehensive One Stop Center, there may be separate Operators for each center or one Operator for multiple centers. The Workforce Development Council determines the number and role of One Stop Operators.

The law specifies a number of entities which may serve as the One Stop Operator. The Act, at section 121(d)(2), identifies entities including consortia, which can serve as the One Stop Operator. With the exception of secondary and elementary schools, any entity of demonstrated effectiveness is eligible to serve in this role.

Staff Recommendation #7:

That, because the Act provides sufficient guidance to identify an entity appropriate for selection as a One Stop Operator, the Council accept the requirements for eligibility to serve as an Operator as specified in section 121(d)(2) of the Act without further expansion.

SELECTION OF OPERATOR

Under the new Idaho system, the Workforce Development Council is responsible for selecting the One Stop Operator. Under the prior system, the local Workforce Investment Board had the option to select the Operator through a competitive process or the use non-competitive processes to select a consortium that includes three or more required One Stop Partners or “grandfather” existing One Stop Operators. With the shift to a statewide system, designation of state agencies may occur without regard to these options.

Non-Competitive Options

Consistent with the WIA plan, Idaho Commerce & Labor is requesting the designation of Idaho Commerce & Labor as the “Operator” of its service locations. This does not preclude the designation of other operators for other Centers selected by the Workforce Development Council. Furthermore, this does not limit the Council’s opportunities to utilize competitive processes for selection of operators of other sites, except for state organizations.

Staff Recommendation #8:

That the Council provide notice to the public that it intends to designate Idaho Commerce & Labor as the One Stop Operator for all Commerce & Labor One Stop Center locations and that other options be considered for any new or expanded center locations. The

designation will become effective at the conclusion of a 30-day public review process, following consideration of any comments received. Where One Stop Partners co-locate in an Idaho Commerce & Labor office, the Center Partners will negotiate a management arrangement acceptable to all partners and the Workforce Development Council and attach such agreement as part of the MOU.

Consortium Option

Section 121(d)(2)(A)(ii) specifies that the local Workforce Investment Board may designate a consortium of three or more “required one stop partners” to serve as the One Stop Operator without the requirement to utilize a competitive process. While three or more required partners must be part of the agreement between the local Workforce Investment Board and the consortium, any number of additional partners may join this consortium arrangement. Section 117(e) which includes the Sunshine Provisions for local Workforce Investment Boards requires that the board notify the public about the certification or designation of the One Stop Operator. Under the current structure, the Workforce Development Council would serve as the local Workforce Investment Board.

There have been a number of questions regarding whether the term “partners” referred to partner entities or partner programs when applied to the consortium option. Recommendation #1 attempts to respond to this issue by identifying One Stop Partners as “entities who operate programs”. As indicated above, there would be no restrictions on additional partners so long as the consortium included three required partners.

Staff Recommendation #9:

That the Council adopt the following process for designation of an Operator under the consortium option:

- 1. The Workforce Development Council will provide notice to the public for a period of thirty days (30) prior to designation if it intends to designate the consortium as the Operator;**
- 2. The Workforce Development Council will designate the consortium, not its individual members, as the One Stop Operator after:**
 - a) Considering and acting upon comments received from the public and other eligible applicants for services;**
 - b) Negotiating an MOU with all required One Stop Partners and the entity(ies) being designated to provide services consistent with the scope and intent of section 134 of the WIA; or**
 - c) If the consortium has reached an impasse in the negotiations with any required partner, submitting a request to the Governor for intervention; after considering comments from the public and any other interested eligible applicants in the local area;**
- 3. The designation of a consortium as a One Stop Operator will not preclude the Workforce Development Council from designating or certifying other entities as One Stop Operators for other center(s), provided that is consistent with the MOU negotiated with the partner organizations; and**

4. **The Workforce Development Council will enter into an agreement with the consortium specifying the role of the Operator and its responsibilities under the WIA, including its adherence to the MOU with the partner organizations.**

“Grandfathering” of an existing One Stop system

The WIA law and regulations provide for continuity for areas that have already established a One Stop system while ensuring that the “reform” provisions of the Act are put into place. For the “Operators” of these systems to be certified, the law requires compliance with the following conditions:

1. The One Stop delivery system, consistent with the scope and meaning of the term in section 134(c), existed prior to the enactment of the WIA on August 7, 1998;
2. The designation or certification must be approved by the Governor, the local Workforce Investment Board and the local elected official;
3. The certification must be consistent with the requirements of:
 - a. WIA section 121(b) which lists the requirements for participation of all required partners;
 - b. The Memorandum of Understanding negotiated with all required and any optional partners; and
 - c. The designation is made consistent with the Sunshine Provisions appearing at section 117(e).

In Idaho, a One Stop system had been established prior to the enactment of the WIA as indicated by the submission of local One Stop plans by the Regional Collaborative Teams and the “initial certification” of the *IdahoWorks* Career Centers (One Stop Centers) in January of 1998. The Council is asked to recommend criteria under which the Governor would approve the certification of these existing systems. This is no longer a practical option given the lapse of time and alternative structures developed since the law was enacted.

Staff Recommendation #10:

That the “Grandfather” provisions no longer be recognized as a means of designating the One Stop Centers.

MEMORANDUM OF UNDERSTANDING (MOU)

The Memorandum of Understanding (MOU) is an agreement developed and executed between the local Workforce Investment Board, with the agreement of the local elected officials, and the One Stop partners relating to the operation of the One Stop delivery system. The WIA at section 121(c)(2) requires each MOU to contain provisions describing:

1. The services to be provided through the one stop delivery system;
2. How the costs of such services and the operating costs of the system will be funded, including the process for paying a proportional share of the costs of the one stop operating system;

3. Methods for referral of individuals between the one stop operator and the one stop partners, for appropriate services and activities;
4. The duration of the MOU and the procedures for amending the MOU; and
5. Other provisions as the parties determine to be appropriate.

WIA emphasizes the full and effective partnerships between local Workforce Investment Boards and One Stop partners and requires these entities to enter into good faith negotiations. The WIA recognizes, however, that the process of negotiation will not always be successful. The regulations at section 662.310 set forth informal procedures and options to employ in the event an impasse is reached in the negotiations. In the event all negotiations fail, the regulations at section 662.310 require notification of the federal partners, the removal of the partner from the local Workforce Investment Board and exclusion of the local Workforce Investment Board from any incentives awarded for coordination. The following are procedures originally adopted by the Council, adapted to substitute the Workforce Development Council for the role of the local Workforce Investment Board.

Staff Recommendation #11:

That the following procedures for resolving an impasse between the Workforce Development Council and the local One Stop Partner be adopted:

1. **The One Stop Partners will attempt to resolve their differences by informal means before employing the formal resolution process, contacting federal agencies as necessary;**
2. **If the One Stop Partners are unable to negotiate a successful resolution, the Workforce Development Council will attempt to mediate a solution and report the results to the Governor and the responsible state agency(ies);**
3. **If the Workforce Development Council is unable to facilitate a successful resolution to the impasse, the parties to the agreement will notify the Governor, Idaho Commerce & Labor and the Federal agency responsible for administering the partner's program; and**
4. **Sanctions will be imposed on the partner program as specified in section 662.310 of the regulations.**

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Attachments



DIRK KEMPTHORNE, GOVERNOR
Roger B. Madsen, Director

WIAP # 5-99

SUBJECT: One Stop Policies

Statutory Reference: WIA§121,134,188

WDC Review Date: 9/21/99

Effective Date: 11/1/99

BACKGROUND

Under the WIA, responsibility for program design and oversight is split between the state and local levels. Although extensive autonomy exists at the local level for the Workforce Investment Board and the One Stop Partners to design the One Stop system, the system must adhere to the policy direction set by the state and a very extensive legislative and regulatory framework.

ISSUES

SYSTEM PARTNERS

BACKGROUND

WIA section 121(b)(1) identifies the entities that are required partners in the One Stop system. Additional partners may participate in the One Stop system if the Local Workforce Investment Board and the Local Elected Officials approve. The “partners” are the entities that carry out the programs as the administering agency at the local level, not the subcontractor to that entity. If there is no local administering agency, the state agency serves as the “entity”. The state has the option to require the participation of additional partners or to defer the decision to the local level.

POLICY

The LEO-WIB partnership, is encouraged but not mandated, to seek out the participation of voluntary partners in the local One Stop system.

PARTNER RESPONSIBILITIES

BACKGROUND

The Regulations at sections 662.230 and 662.260 list the responsibilities of the mandatory partners. All required partners must make their applicable core services available in the One Stop Center and provide

access to their other activities and programs. They must use a portion of their funds to create, maintain and participate in the One Stop delivery system, and provide their core services. They are required to enter into a Memorandum of Understanding (MOU) with the local Workforce Investment Board relating to the operation of the One Stop system, and to serve as a representative on the board

POLICY

When applying the terms “One Stop partner” and “Required One Stop partner” to the various opportunities and requirements listed in the Act, Regulations and state policy, the following definitions will be used.

That a One Stop Partner is defined as the entity that serves as the administrative entity for one or more of the partner programs listed at WIA section 121(b)(1). It excludes subrecipients of these entities.

That required One Stop Partners shall be defined as only those One Stop Partner entities which operate programs listed as required at 121(b)(1). All other partners are considered voluntary and are not subject to the requirements or opportunities afforded “required partners” unless agreed to by the partner, the Workforce Investment Board and the Chief local elected official.

APPLICABLE CORE SERVICES

BACKGROUND

Required One Stop Partners must make their applicable core services for a program available in at least one One Stop Center in the Workforce Investment Area. The State has the option to require additional core services or otherwise add to the definitions.

POLICY

The One Stop Partners, in accordance with agreements established with the Local Workforce Investment Boards, shall make available the applicable core services listed at Section 134(d)(2) of the WIA and are encouraged, but not mandated, to provide additional service elements in the local One Stop system.

LOCATION AND STRATEGY FOR PROVIDING SERVICES

BACKGROUND

The regulation at section 662.250 describes where and to what extent the One Stop partners must make available the applicable core services. Section 134(c) of WIA requires that the applicable core services be made available to individuals attributable to the partner program at the comprehensive One Stop Center.

The regulation at section 662.260 provides that, in addition to the provision of core services, the One Stop partners must use the One Stop system to provide access to the partners' other activities and programs. This access must be described in the MOU. This is intended to ensure a seamless, comprehensive workforce

development system that identifies the service options available to individuals and helps to facilitate access to these services.

The partner may provide core services at the center:

- Through the use of appropriate technology at the center;
- By co-locating personnel at the center;
- Cross-training of staff; or
- Through a cost-reimbursement or other agreement between center partners as agreed to in the MOU.

POLICY

The minimum service standards that will apply to the delivery of services is as follows:

1. Required One Stop Partners will make applicable core services available and provide access to other services in at least one physical One Stop Center within each workforce region.
2. Partners may utilize any authorized methodology to deliver core services provided the methodology
 - is consistent with the Partner's authorizing legislation and the WIA;
 - does not require the customer to travel to another location to obtain the core service; and
 - meets minimum standards of accessibility set forth in section 188(a)(1) of the WIA.
3. Access to other partner activities and programs will be described in the local MOU.

ADDITIONAL SITES

BACKGROUND

In addition to the comprehensive centers, the regulation notes that WIA allows for three other arrangements to supplement the comprehensive center. These supplemental arrangements include:

- (1) a network of affiliated sites that can provide one or more of the programs, services and activities of the partners;
- (2) a network of One Stop partners through which each partner provides services that are linked, physically or technologically, to an affiliated site and through which all individuals are provided information on the availability of core services in the local area; and
- (3) specialized centers that address specific needs.

The particular design, including the number of centers and other supplemental arrangements will be identified as a process of negotiation of the MOU with the Local Workforce Investment Board.

One Stop partners have an obligation to ensure that core services that are appropriate for their particular populations are made available at one comprehensive center. It is not required that partners provide applicable core services exclusively at a One Stop Center. Further, a partner is not required to route all of its participants through the comprehensive One Stop Center. If an individual enters the system through one of the network sites rather than the comprehensive One Stop Center, the individual may still obtain certain services at the network site and information about how and where all the other services provided through the One Stop system may be obtained.

Participation in the One Stop system, either at the center, or an affiliate location, will ultimately be decided as a product of the MOU between the partners and the local Workforce Investment Board. The following policy is intended to ensure continuation of maximum access and consistent quality of that access.

POLICY

All required partners and voluntary partners are encouraged to offer access to the services through the One Stop system by assuring an awareness of system services at any point of entry.

Those partners wishing to be identified as “affiliate” partner sites will

- enter into an MOU with the local WIB describing their specific participation in the one stop system;
- maintain access to the Idaho Works automated system;
- offer assisted services to those who prefer such services over automated services; and
- make accurate and up to date information on their services available for access through Idaho Works.

ONE STOP OPERATORS – ELIGIBILITY TO BE DESIGNATED

BACKGROUND

The WIA introduces the concept of the One Stop Operator. The role of the One Stop Operator or Operators is to administer the One Stop Center or centers. Their responsibility may range from simply coordinating service providers within the center to being the primary provider of services at the center. In areas where there is more than one comprehensive One Stop Center, there may be separate Operators for each center or one Operator for multiple centers. The Local Workforce Investment Board determines the number and role of One Stop Operators within each region.

The law specifies a number of entities which may serve as the One Stop Operator. The Act, at section 121(d)(2) identifies entities, including consortia, which can serve as the One Stop Operator. With the exception of secondary and elementary schools, any entity of demonstrated effectiveness is eligible to serve in this role.

POLICY

Entities wishing to serve as a One Stop Operator must be eligible to apply as specified at section 121(d)(2) of the Act.

SELECTION OF OPERATOR

The WIA gives the responsibility for selecting the One Stop Operator to the Local Workforce Investment Board.

The Local Workforce Investment Board may select the Operator through a competitive process, or the Local Workforce Investment Board may designate a consortium that includes three or more required One Stop Partners as an Operator. The law also addresses the “grandfathering” of existing One Stop Operators.

The conditions proposed for conduct of a competitive process are described in a separate WIAP. This section is intended to articulate policies when non-competitive processes are used under the consortium or grandfathering options.

Consortium Option

BACKGROUND

Section 121(d)(2)(A)(ii) specifies that the Local Workforce Investment Board may designate a consortium of three or more “required one stop partners” to serve as the One Stop Operator without the requirement to utilize a competitive process. While three or more required partners must be part of the agreement between the local workforce board and the consortium, any number of additional partners may join this consortium arrangement. Section 117(e) which includes the Sunshine Provisions for Local Workforce Investment Boards, requires that the board notify the public about the certification or designation of the One Stop Operator.

POLICY

The following process for designation of an Operator under the consortium option shall be used:

1. The local Workforce Investment Board may consider a request submitted by a consortium of three or more required One Stop Partners for designation as a One Stop Operator without regard to competition;
2. The local Workforce Investment Board will provide notice to the public for a period of thirty days (30) prior to designation if it intends to designate the consortium as the Operator;
3. The local Workforce Investment Board will designate the consortium, not its individual members, as the One Stop Operator after:
 - a) Considering and acting upon comments received from the public and other eligible applicants for services;
 - b) Negotiating an MOU with all required One Stop Partners and the entity(ies) being designated to provide services consistent with the scope and intent of section 134 of the WIA; or
 - c) If the local Workforce Investment Board has reached an impasse in the negotiations with any required partner, submitting a request to the Governor for intervention; after considering comments from the public and any other interested eligible applicants in the local area;
4. The designation of a consortium as a One Stop Operator will not preclude the local Workforce Investment Board from designating or certifying other entities as One Stop Operators for other center(s), provided that is consistent with the MOU negotiated with the partner organizations; and
5. The local Workforce Investment Board will enter into an agreement with the consortium specifying the role of the Operator and its responsibilities under the WIA, including its adherence to the MOU with the partner organizations.

“Grandfathering” of an existing One Stop system

BACKGROUND

The WIA law and regulations provide for continuity for areas that have already established a One Stop system while ensuring that the “reform” provisions of the Act are put into place. For the “Operators” of these systems to be certified, the law requires compliance with the following conditions:

1. The One Stop delivery system, consistent with the scope and meaning of the term in section 134(c), existed prior to the enactment of the WIA on August 7, 1998;
2. The designation or certification must be approved by the Governor, the local Workforce Investment Board and the Chief elected official;
3. The certification must be consistent with the requirements of:
 - a. WIA section 121(b) which lists the requirements for participation of all required partners;
 - b. The Memorandum of Understanding negotiated with all required and any optional partners; and
 - c. The designation is made consistent with the Sunshine provisions appearing at section 117(e).

In Idaho, a One Stop system had been established prior to the enactment of the WIA as indicated by the submission of local One Stop plans by the Regional Collaborative Teams and the “initial certification” of the Idaho Works Career Centers (One Stop Centers) in January of 1998.

POLICY

The following policy outlines the criteria under which the Governor would approve the certification of these existing systems.

The Governor will approve a request to “grandfather” an existing system under the following conditions:

1. A request for certification has been submitted by an entity or consortium of entities who were certified to operate an Idaho Works Career Center prior to August 7, 1998, or
2. in those cases where an entity within the consortium is precluded from participation or no longer available to provide One Stop services, the remaining members of the existing consortium have submitted such a request;
3. The local Workforce Investment Board and the local elected officials have publicly announced their intent to designate the existing entity as the One Stop Operator, and for a period of no less than thirty (30) days, have provided the public and other eligible entities in the local area an opportunity to comment on the designation;
4. The local Workforce Investment Board and the local elected officials have agreed to designate the entity as the Operator after:
 - a. Considering and acting upon comments received from the public and other eligible applicants for services;
 - b. Negotiating an MOU with all required One Stop Partners and the entity(ies) being designated to provide services consistent with the scope and intent of section 134 of the WIA; or

- c. If the local Workforce Investment Board has reached an impasse in the negotiations with any required partner, submitting a request to the Governor for intervention; and
5. The local Workforce Investment Board and the local elected officials have submitted such request, together with any comments received and a summary of action taken on those comments, to the Workforce Development Council; the Workforce Development Council will make a recommendation on the request to the Governor.

MEMORANDUM OF UNDERSTANDING (MOU)

BACKGROUND

The Memorandum of Understanding (MOU) is an agreement developed and executed between the Local Workforce Investment Board, with the agreement of the local elected officials, and the One Stop partners relating to the operation of the One Stop delivery system. The WIA at section 121(c)(2) requires each MOU to contain provisions describing:

1. The services to be provided through the one stop delivery system;
2. How the costs of such services and the operating costs of the system will be funded, including the process for paying a proportional share of the costs of the one stop operating system;
3. Methods for referral of individuals between the one stop operator and the one stop partners, for appropriate services and activities;
4. The duration of the MOU and the procedures for amending the MOU; and
5. Other provisions as the parties determine to be appropriate.

WIA emphasizes the full and effective partnerships between Local Workforce Investment Boards and One Stop partners and requires these entities to enter into good faith negotiations. The WIA recognizes, however, that the process of negotiation will not always be successful. The regulations at section 662.310 set forth informal procedures and options to employ in the event an impasse is reached in the negotiations. In the event all negotiations fail, the regulations at section 662.310 require notification of the federal partners, the removal of the partner from the local Workforce Investment Board and exclusion of the local Workforce Investment Board from any incentives awarded for coordination.

POLICY

The following procedures for resolving an impasse between a local Workforce Investment Board and the local One Stop Partner shall be employed:

1. The local Workforce Investment Board and the local One Stop Partner will attempt to resolve their differences by informal means before employing the formal resolution process;
 - a. The Local Workforce Investment Board and local partner will document their efforts at negotiation and request the assistance of the appropriate state agency(ies) in an effort to resolve the impasse situation;
 - b. The state agency(ies) may contact their federal partners for assistance upon the agreement of all parties involved;

2. If negotiations cannot be resumed successfully through this negotiation process, the parties to the negotiation will present the issue to the Workforce Development Council, which will attempt to mediate the dispute and assist the parties in arriving at a resolution.
3. If the Council is able to negotiate a successful resolution, the Council will report the results to the Governor and the responsible state agency(ies);
4. If the Workforce Development Council is unable to facilitate a successful resolution to the impasse, the parties to the agreement will notify the Governor, the Department of Labor and the state agency responsible for administering the partner's program;
5. The responsible state agencies will report the situation to the Secretary of Labor and the head of any other Federal agency with responsibility for oversight of a partner's program, and
6. Sanctions will be imposed on the board and/or the partner program as specified in section 662.310 of the regulations.

Primary Contact: Cheryl Brush (208) 334-6303
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IDAHO WORKFORCE PERFORMANCE MEASURES PERFORMANCE GOALS FOR PY 2006

Adult Measures - WIA

Entered Employment	87%
Employment Retention	84%
Average 6 Months Earnings	\$ 9,800

Dislocated Worker Measures - WIA

Entered Employment	90%
Employment Retention	91%
Average 6 Months Earnings	\$13,500

Youth Measures

Placement in Employment or Education	50%
Attainment of a Degree or Certificate	49%
Numeracy & Literacy	30%

Wagner Peyser

Entered Employment Rate	72%
Retention Rate	82%
Average 6 Month Earnings	\$13,500

IDAHO WORKFORCE INVESTMENT ACT PERFORMANCE MEASURES
PERFORMANCE GOALS FOR PY 2005 AND PY 2006

	PY 05	PY 06
Adult Programs		
1. Entered Employment Rate	87%	87%
2. Employment Retention Rate @ Six Months	84%	84%
3. Average Earnings Change in Six Months	\$3,900	\$3,900
4. Employment and Credential Rate	70%	73%
Dislocated Worker Program		
5. Entered Employment Rate	90%	90%
6. Employment Retention Rate @ Six Months	91%	91%
7. Earnings Replacement Rate in Six Months	-\$1,500 / 88%	-\$1,500 / 88%
8. Employment and Credential Rate	72%	74%
Older Youth (aged 19-21)		
9. Entered Employment Rate	83%	83%
10. Employment Retention Rate @ Six Months	89%	89%
11. Average Earnings Change in Six Months	\$3,094	\$3,094
12. Credential Rate	58%	59%
Younger Youth (aged 14-18)		
13. Skill Attainment Rate	92%	92%
14. Diploma or Equivalent Attainment	77%	77%
15. Retention Rate	78%	78%
Customer Satisfaction		
16. Participant customer satisfaction	85	85
17. Employer customer satisfaction	85	85

STATE 15% SET-ASIDE PLANS – PY'06

WIA Title IB funds reserved for state level activities will be used to support the following:

- Rapid response activities for dislocated workers;
- Disseminating:
 - The State list of eligible providers of training services (including those providing non-traditional training services) for adults and dislocated workers;
 - Information identifying eligible providers of on-the-job training and customized training;
 - Performance and program cost information about these providers; and
 - A list of eligible providers of youth activities;
- Conducting evaluations of adults, dislocated workers and youth activities, to establish and promote methods for continuously improving such activities to achieve high-level performance within, and high-level outcomes from, the Statewide workforce investment system;
- Providing incentive grants to local areas for regional cooperation among local boards, for local coordination of activities carried out under WIA; and for exemplary performance by local areas on the performance measures;
- Providing technical assistance to local areas that fail to meet local performance measures;
- Assisting in the establishment and operation of One Stop delivery systems;
- Providing additional assistance to local areas that have high concentrations of eligible youth; and
- Operating a fiscal and management accountability information system.

Specifically, PY 2005 funds (estimated budgets) will be used to support the following activities and services:

Rapid Response

The full 25% will be reserved for use in Rapid Response activities. Approximately \$200,000 per year will be used for direct Rapid Response activities with the remaining funds distributed to areas demonstrating a need for funds. Of the \$200,000, a portion will be made available for supporting a contract with AFL-CIO to aid in rapid response with dislocated workers.

Reserve for Eligible Provider List

The State will use funding as needed to explore the use of Unemployment Insurance and other administrative records to facilitate the verification of outcome data from eligible training providers and to explore alternative data sources to ease the burden on the providers of collecting and reporting this information. Because this has been a shared cost among agencies, no amount is specified.

Reserve for Evaluation Contracts

\$10,000 will be reserved to pay for costs of ongoing customer satisfaction surveys for all customer groups in the WIA. This amount is reduced by \$40,000 to reflect the elimination of the statewide customer satisfaction survey.

Incentive Grants

During transition year PY'06, \$100,000 will be set aside to incent the special Region VI Area for participation in the Idaho Workforce Consortium. Additional incentive funds for performance will not be awarded during PY'06.

Assisting in the Operation of the One Stop System

The state will make available 10% of the new state funds each year to assist in the operation of the One Stop system. This is estimated to be approximately \$140,000. These funds will be directed towards improvements in the WIA MIS, partially as a result of common measures and continued changes in reporting.

Areas with High Concentrations of Eligible Youth

The State will budget \$100,000 to support programs in areas with high concentrations of eligible youth (those in poverty experiencing other barriers). Half of these funds will be divided among those regions whose poverty rates for youth exceed the state average, based on the most recent data available, and the other half will be shared equally among those regions that will (a) experience allocation reductions in PY2006 and (b) expend at least 80% of their PY2005 fund availability. This strategy for providing additional assistance to local areas with high concentrations of eligible youth is for PY'06 and will be reexamined on an annual basis.

Capacity Building and Technical Assistance

The State is reserving \$25,000 to be used to finance consultants, training conferences or other activities to build the capacity of the workforce investment system under WIA. Local areas will be polled to determine their specific needs for training and assistance and will be included in decisions about the specific use of these funds.

Fiscal and Program Management

The State is reserving approximately \$1.1 million to pay for the costs of state administration and program functions and to support the costs of the shared state-local systems including the statewide MIS and FMIS systems, monitoring, data validation and support to the Workforce Development Council.

Optional activities

Assuming that sufficient funding is available to fund the activities identified above and that future funding remains fairly consistent, additional support may be made for the optional activities described below in the order of preference:

Older Worker Assistance

A grant will be made available to the Idaho Commission on Aging to provide continued support through technical assistance to the system to ensure that the needs of older workers are addressed in the One Stop Delivery System. Approximately \$29,000 will be made available for this purpose.

Labor Market Information

An additional \$100,000 has been set aside annually to contribute to the costs of Regional Labor Economists and to support investments in software that improve workforce information at the state and local levels. Other sources of funds supporting this activity include Wagner-Peyser and the Workforce Information Grant.

Marketing

\$20,000 will be set aside to provide for updating the *IdahoWorks* website to improve information available to system customers and or to provide new printed materials for customer information and outreach.

Additional Support for Dislocated Workers, High Growth Projects and Reserve

Because of the continuing steep drop in funds, Idaho Commerce & Labor is requesting the option to set aside funds in a reserve account to avoid a crisis in programs and staffing in PY'07. This will allow Commerce & Labor to reduce staffing and other costs while minimizing significant impacts on program quality. Any carry-in funds not already committed above or set aside for the reserve fund will be reserved to make additional dislocated worker funds available to the local areas. The Workforce Development Council may also direct resources for additional high growth projects if the Council determines that has a priority for funding. Note: Since the plan was reviewed, the Council has reserved \$300,000 to address worker shortages in manufacturing. A similar amount is being reserved for potential use in additional high growth projects, dislocated workers and the PY 07 transition account. This will be reconsidered when allotments for PY'07 are released.

STATE 15% SET-ASIDE PLANS

WIA Title IB funds reserved for state level activities will be used to support the following:

- Rapid response activities for dislocated workers;
- Disseminating:
 - The State list of eligible providers of training services (including those providing non-traditional training services) for adults and dislocated workers;
 - Information identifying eligible providers of on-the-job training and customized training;
 - Performance and program cost information about these providers; and
 - A list of eligible providers of youth activities;
- Conducting evaluations of adults, dislocated workers and youth activities, to establish and promote methods for continuously improving such activities to achieve high-level performance within, and high-level outcomes from, the Statewide workforce investment system;
- Providing incentive grants to local areas for regional cooperation among local boards, for local coordination of activities carried out under WIA; and for exemplary performance by local areas on the performance measures;
- Providing technical assistance to local areas that fail to meet local performance measures;
- Assisting in the establishment and operation of One Stop delivery systems;
- Providing additional assistance to local areas that have high concentrations of eligible youth; and
- Operating a fiscal and management accountability information system.

Specifically, PY 2005 funds (estimated budgets) will be used to support the following activities and services:

Rapid Response

The full 25% will be reserved for use in Rapid Response activities. Approximately \$200,000 per year will be used for direct Rapid Response activities with the remaining funds distributed to areas demonstrating a need for funds. Of the \$200,000, a portion will be made available for supporting a contract with AFL-CIO to aid in rapid response with dislocated workers.

Reserve for Eligible Provider List

The State will use funding as needed to explore the use of Unemployment Insurance and other administrative records to facilitate the verification of outcome data from eligible training providers and to explore alternative data sources to ease the burden on the providers of collecting and reporting this information. Because this has been a shared cost among agencies, no amount is specified.

Reserve for Evaluation Contracts

\$50,000 will be reserved to pay for costs of ongoing customer satisfaction surveys for all customer groups in the WIA.

Incentive Grants

During transition year PY'05, \$100,000 will be set aside to incent the special Region VI Area for participation in the Idaho Workforce Consortium. Incentive funds for performance will not be awarded during PY'05. The Workforce Development Council will examine the amounts to be awarded in PY'06 based on funds available and will use the existing incentive policy.

Assisting in the Operation of the One Stop System

The state will make available 10% of the new state funds each year to assist in the operation of the One Stop system. This is estimated to be approximately \$140,000. These funds will be directed towards improvements in the WIA MIS, partially as a result of common measures.

Areas with High Concentrations of Eligible Youth

The State will budget \$100,000 to support programs in areas with high concentrations of eligible youth (those in poverty experiencing other barriers). Half of these funds will be divided among those regions whose poverty rates for youth exceed the state average, based on the most recent data available, and the other half will be shared equally among those regions that will (a) experience allocation reductions in PY2005 and (b) expend at least 80% of their PY2004 fund availability. This strategy for providing additional assistance to local areas with high concentrations of eligible youth is for PY2005 only and will be reexamined on an annual basis.

Capacity Building and Technical Assistance

The State is reserving \$25,000 to be used to finance consultants, training conferences or other activities to build the capacity of the workforce investment system under WIA. Local areas will be polled to determine their specific needs for training and assistance and will be included in decisions about the specific use of these funds.

Fiscal and Program Management

The State is reserving approximately \$1.1 million to pay for the costs of state administration and program functions and to support the costs of the shared state-local systems including the statewide MIS and FMIS systems, monitoring, data validation and support to the Workforce Development Council.

Optional activities

Assuming that sufficient funding is available to fund the activities identified above and that future funding remains fairly consistent, additional support may be made for the optional activities described below in the order of preference:

Older Worker Assistance

A grant will be made available to the Idaho Commission on Aging to provide continued support technical assistance to the system to ensure that the needs of older workers are addressed in the One Stop Delivery System. Approximately \$25,000 will be made available for this purpose.

Customized and Incumbent Worker Training

Projects approved by the Workforce Development Council in Region III, IV, V, and VI will be continued through PY'05 using PY'04 funds set aside for this purpose. There are four projects, one for construction in the Boise area, a nursing program operated in the Magic Valley, a small distance learning project operated jointly by ISU and Bear Lake Hospital and two projects operated as a partnership between EITC and local health care providers in Ashton and Driggs. If adequate carry-in funds are available to meet other priority needs for dislocated workers and youth in need programs, the Workforce Development Council will be asked to consider awarding funds for other projects.

Labor Market Information

An additional \$100,000 has been set aside annually to contribute to the costs of Regional Labor Economists and to support investments in software that improve workforce information at the state and local levels. Other sources of funds supporting this activity include Wagner-Peyser and the Workforce Information Grant.

Marketing

\$20,000 will be set aside to provide for updating the *IdahoWorks* website to improve information available to system customers. Additional marketing materials will be developed to increase awareness among Faith-based and Community-based organizations as a support to their constituents.

Additional Support for Dislocated Workers and Youth in Need

Because of the steep drop in funds, any carry-in funds not already committed above will be reserved to make additional dislocated worker and youth-in-need funds available to the local areas. The Workforce Development Council may also direct resources for additional high growth projects if the Council determines that has a priority for funding.