

# **South Carolina PYS**

2020-2023

## Disclaimer

South Carolina's four-year WIOA Combined State Plan submitted on March 31, 2020 was approved, and took effect July 1, 2020, covering program years 2020 through 2023 (July 1, 2020 through June 30, 2024). However, that decision did not constitute a determination on the program-specific requirements of the Combined State Plan for those programs administered by Federal agencies other than the U.S. Departments of Labor and Education:

- the Temporary Assistance for Needy Families (TANF) program authorized under 42 U.S.C. 601 et seq., administered by the U.S. Department of Health and Human Services; and
- the Employment and Training programs under the Supplemental Nutrition Assistance Program (SNAP) authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 administered by the U.S. Department of Agriculture.

While SNAP has received federal approval, the TANF program is in modification as of April 23, 2021. The state plan can also be accessed via the [wioaplans.ed.gov](http://wioaplans.ed.gov) website.

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# OVERVIEW

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Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service

delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plan

## Options for Submitting a State Plan

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

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

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

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))<sup>1</sup>
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

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

## How State Plan Requirements Are Organized

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

- **The Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- **The Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  - State Strategy Implementation,
  - State Operating Systems and Policies,
  - Assurances,
  - Program-Specific Requirements for the Core Programs, and
  - Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the

## OVERVIEW

Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.<sup>2</sup> States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

**Paperwork Reduction Act:** The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

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

# I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

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## a. WIOA State Plan Type

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

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

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

This is a combined plan

### Combined Plan Partner Program(s)

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

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

No

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

Yes

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

Yes

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

No

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

Yes

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

Yes

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

No

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

No

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

No

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

No

## b. Plan Introduction or Executive Summary

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

### WIOA Combined State Plan Executive Summary

#### *Background*

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each state must submit either a Unified or a Combined State Plan outlining a four-year strategy for the state's workforce development system.

#### *Type of State Plan*

A Unified State Plan covers the six WIOA core programs, including -

- Adult (Title I of WIOA),
- Dislocated Worker (Title I),
- Youth (Title I),
- Adult Education and Family Literacy Act (Title II),
- Wagner-Peyser Act (Title III), and
- Vocational Rehabilitation (Title IV)

Alternatively, a Combined State Plan outlines a strategic plan for the six WIOA core programs plus one or more additional program partners.

South Carolina will submit a Combined State Plan covering the following programs:

- Adult (Title I of WIOA),
- Dislocated Worker (Title I),
- Youth (Title I),
- Adult Education and Family Literacy Act (Title II),
- Wagner-Peyser Act (Title III), and
- Vocational Rehabilitation (Title IV), plus
- Temporary Assistance for Needy Families,
- Employment and Training programs under the Supplemental Nutrition Assistance program,

- Trade Adjustment Assistance, and
- Jobs for Veterans State Grant.

## *Coordination with State Plan Programs*

The Combined State Plan represents a co-created strategy for expanding and developing a skilled workforce and a responsive workforce system that is accessible by all South Carolinians. A representative(s) from each of the covered programs participated on the State Plan Work Group. The Work Group met regularly to review the existing plan, identify areas of improvement, develop shared priorities and action items, and respond to USDOL's required planning elements. Other partners were engaged through targeted focus group discussions and presentations to each committee of the State Workforce Development Board (SWDB).

## *Public Comment*

The plan was published on the SC Works website for public comment on February 28, 2020. Four responses were received from the following organizations:

- Protection & Advocacy
- Transitions Homeless Shelter
- Catawba Regional Council of Governments
- Apprenticeship Carolina™

## *Key Sections of the Combined State Plan*

The State Plan is organized into three key sections:

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and strategies to align and strengthen workforce development activities that support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the strategic vision and goals identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure (e.g. integrated data systems) and policies (e.g. enrollment and referral policies) to meet its strategic goals, implement strategies for alignment, and support ongoing program development and coordination.
- The **Individual Program Plans** section includes program-specific plans for each of the programs covered in the Combined Plan. The covered programs are identified above.

## *Takeaways from the Economic and Workforce Analysis*

The Strategic Planning Elements section includes an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate. It must also include an analysis of the current workforce, including individuals with barriers to employment. Highlights of the economic and workforce analysis are provided below:

- South Carolina has experienced very strong economic growth since emerging from the effects of the Great Recession in 2010. The State's GDP growth has kept pace with national trends.

- The State's unemployment rate has remained below the national average for 23 of the past 28 months, beginning in September 2016, and is now routinely one percentage point below the U.S. average.
- The number of people employed in the State has increased by nearly 145,000 between January 2015 and December 2018, a 6.9 percent increase. The number of unemployed has fallen from 146,054 to 75,244 over the same period, a 48.5 percent drop.
- The low unemployment rate has helped to increase nominal wage growth across the state. Average hourly earnings typically grew between 1.5 percent and 2.5 percent throughout both 2014 and 2015, before peaking between 3 percent and 5 percent from 2016-2018.
- South Carolina has consistently experienced lower labor force participation than the U.S. as a whole. In January 2008, the S.C. rate was 62.4 percent compared to the U.S. rate of 66.2 percent. This labor force participation gap remained fairly consistent through 2013 before narrowing slightly between 2014 and 2015. However, since 2015 the rates have begun once again to diverge.
- South Carolina currently has a high concentration of employment in the Trade, Transportation, and Utilities; Government; and Professional and Business Services sectors. These three industries represent over 50 percent of non-farm employment in South Carolina in 2018. While the State is expected to grow, there is expected to be little change in the general distribution of employment among these super sectors.
- The most "in-demand" jobs over the twelve month period from May 2018 through April 2019 were Registered Nurses, Nursing Assistants, Retail Salespersons, Supervisors of Retail Sales Workers, Stock Clerks, Truck Drivers, Maintenance Workers, Supervisors of Production Workers, Cashiers, and Maids.
- Through the year 2026, both Food Preparation and Serving-Related Occupations as well as Office and Administrative Support Occupations will continue to remain in high demand as their employment levels are expected to increase by 40,748 and 37,442, respectively.
- Just under 21 percent of jobs in South Carolina require a bachelor's degree or higher while just under 60 percent of jobs require only a high school diploma or less. Eleven percent of jobs require some college or an associate's degree.
- A 2018 Supply Gap Analysis indicates there is likely to be a labor shortage in a significant number of occupations requiring higher education.
- Many of the state's jobless face significant barriers to employment, requiring more intensive services and alignment across partners to prepare them for current and future employment opportunities.

### *Takeaways from Workforce Development, Education and Training Activities Analysis*

South Carolina is fortunate to have a large number of workforce development, education and training activities. The plan includes a summary of the programs and services available in our State, many of which aim to serve specific population groups, such as individuals with disabilities or offenders. However, a key weakness of these activities is that programs operate in silos and there is very little alignment and coordination creating a system that is fragmented and difficult to access, especially for individuals that are faced with multiple barriers.

The priorities and corresponding action steps discussed below address the weaknesses identified in the Workforce Development, Education and Training Activities Analysis and are intended to improve South Carolina's workforce development system for all stakeholders.

## *Vision and Goals for South Carolina's Workforce System*

The Combined State Plan must describe the state's strategic vision for its workforce development system, and the goals for achieving this vision. This section must include goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment, and goals for meeting the needs of employers. The plan includes the following vision and strategic goals.

**Vision:** To expand and develop a skilled workforce and a responsive workforce system that meets the needs of business and industry leading to sustainable growth economic prosperity and regional and global competitiveness for South Carolina.

**Objective 1:** Identify, invest in, and support educational and developmental strategies to better prepare and expand a skilled workforce for current and emerging jobs.

**Strategy 1.1** Increase participation in work-based learning activities, including registered apprenticeships.

**Strategy 1.2** Increase the formal assessment of soft-skills and provision of soft skills training.

**Strategy 1.3** Increase resource investment into direct services for job seekers through results-oriented discretionary grants.

**Objective 2:** Align resources, policies, and strategies between state, local, and regional systems to continuously improve outcomes for businesses, partners and individuals, including those with barriers to employment.

**Strategy 2.1** Increase co-enrollment across partner programs.

**Strategy 2.2** Develop and implement cross-partner staff training to enhance service delivery to businesses and job seekers.

**Strategy 2.3** Streamline intake systems and referral processes.

**Strategy 2.4** Implement strategies that increase access to reliable transportation, affordable housing and identification and vital records.

**Strategy 2.5** Increase the number of regional, industry-led, sector partnerships.

**Objective 3:** Identify current and future workforce needs of South Carolina business and industry to support career pathways in growth sectors.

**Strategy 3.1** Identify the challenges and opportunities in rural communities.

**Strategy 3.2** Develop career pathway tools and templates.

**Objective 4:** Engage job seekers, employers, and other workforce partners through marketing and outreach and articulate a value proposition specific to each.

**Strategy 4.1** Share best practices across partner programs in order to increase awareness of partner services, promote a workforce of growth and continuous improvement, and encourage a system viewpoint.

**Strategy 4.2** Improve strategic outreach to employers.

*Submission and Approval*

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The WIOA Combined Plan was reviewed, discussed, and approved by the State Workforce Development Board on Wednesday, March 25, 2020.

## **II. STRATEGIC ELEMENTS**

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

### **a. Economic, Workforce, and Workforce Development Activities Analysis**

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

#### **1. Economic and Workforce Analysis**

##### **A. Economic Analysis**

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

###### **i. Existing Demand Industry Sectors and Occupations**

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

###### **ii. Emerging Demand Industry Sectors and Occupations**

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

###### **iii. Employers' Employment Needs**

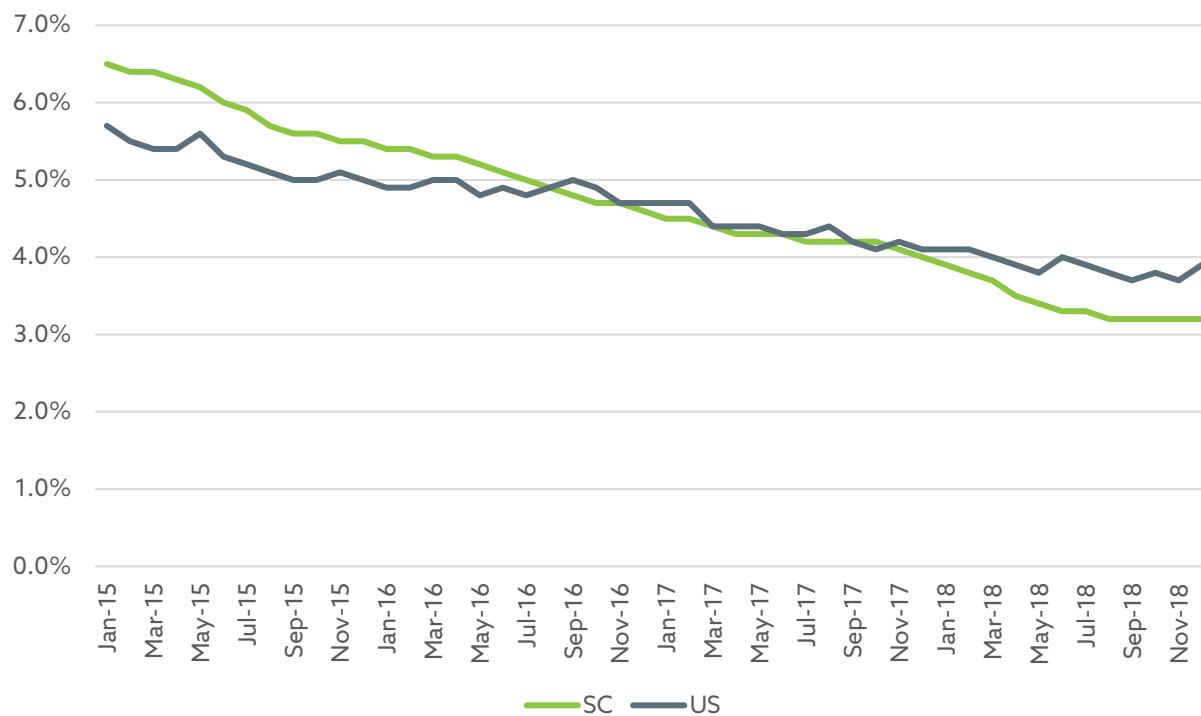
With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

*The responses for II.a.1.A. Economic Analysis and II.a.1.B. Workforce Analysis are combined responses.*

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##### **Unemployment, Earnings, and Gross Domestic Product**

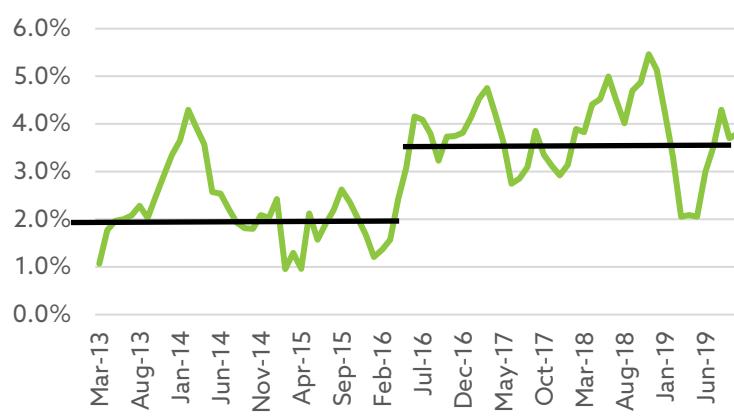
By multiple measures, the South Carolina economy has experienced healthy growth over the past several years. The state's unemployment rate has remained below that of the national rate for 23 of the past 28 months beginning in September 2016 and is now routinely one percentage point below the U.S. average.

**Figure 1: S.C. and U.S. Unemployment Rate, 2015-2018**

Source: Bureau of Labor Statistics, Seasonally Adjusted

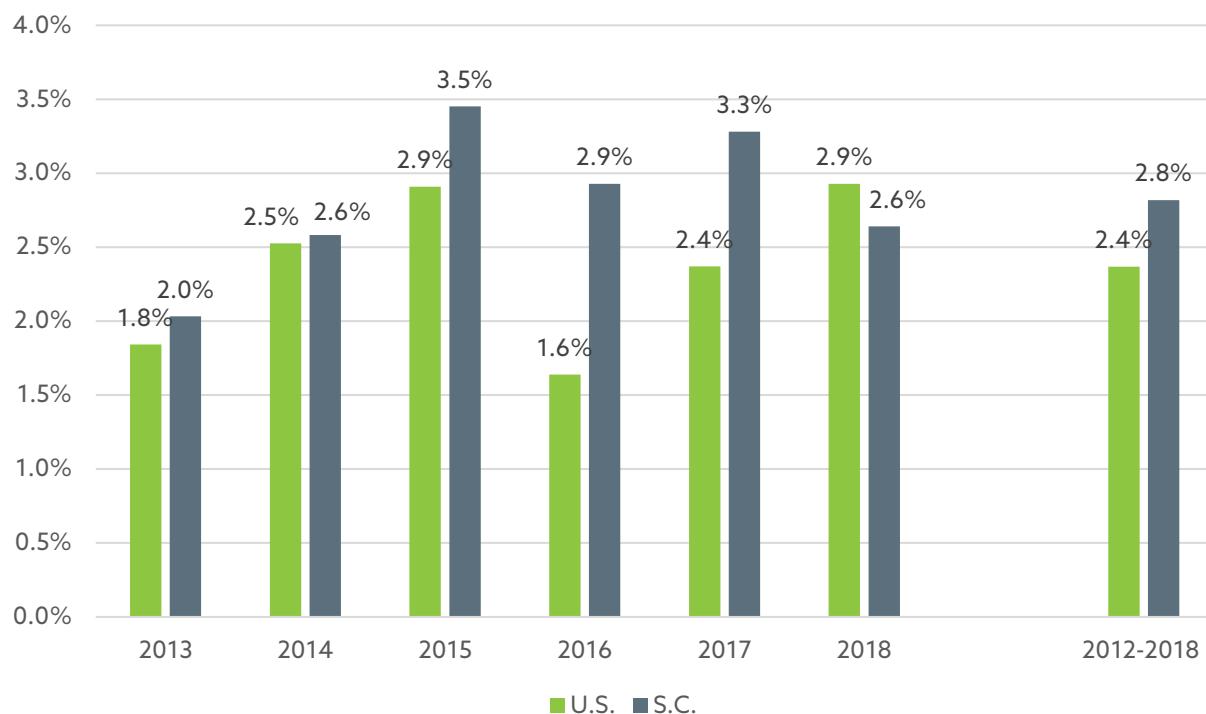
The number of people employed in the state has increased by nearly 145,000 between January 2015 and December 2018, a 6.9 percent increase. The number of unemployed has fallen from 146,054 to 75,244 over the same period, a 48.5 percent drop.

As the state's unemployment rate has continued to fall, there has been a growing concern among many industries of a labor shortage. The state's employment growth in 2019 fell compared to prior years as there were fewer additional workers available to fill new jobs. The low, and continuing to fall, unemployment rate has also helped to push up nominal wage growth across the state. Average hourly earnings typically grew between 1.5 percent and 2.5 percent throughout both 2014 and 2015 before peaking between 3 percent and 5 percent from 2016-2018.

**Figure 2: S.C. Total Private Average Hourly Earnings Growth**

Source: Current Employment Statistics, Non-Seasonally Adjusted, 3-month moving average.

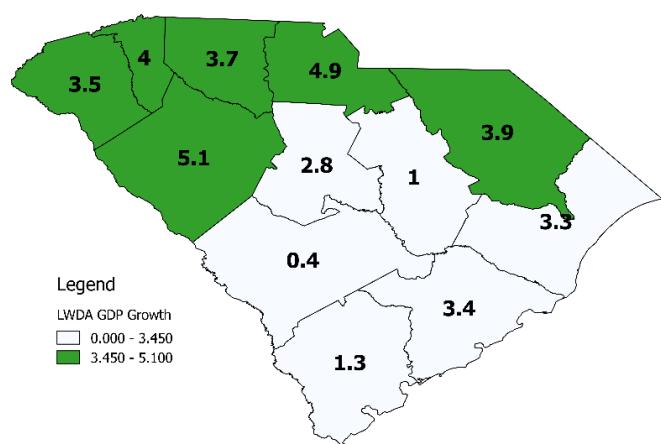
South Carolina's gross domestic product (GDP) growth has also kept pace with national trends. Between 2012 and 2018, the state's real GDP grew at an annualized rate of 2.8 percent compared to the national growth rate of 2.4 percent.



**Figure 3: U.S. vs. S.C. GDP Growth**

Source: U.S. Bureau of Economic Analysis

South Carolina's strong economic performance is not universally distributed across the state. GDP growth for the Local Workforce Development Areas (LWDA) is only available from the Bureau of Economic Analysis through 2015. During the period 2014 to 2015 the areas of WorkLink, Greenville, Upper Savannah, Catawba, and Pee Dee grew faster than the state average, reflecting a general trend of improved economic performance in areas associated with manufacturing, particularly transportation equipment manufacturing. For 2018 and into the foreseeable future, these areas are more at risk for economic slowdowns associated with the ongoing trade dispute between the U.S. and China as well as slower global growth, which can reduce demand for manufactured exports.



employment growth rates faster than the state average. Between December 2017 and December 2018

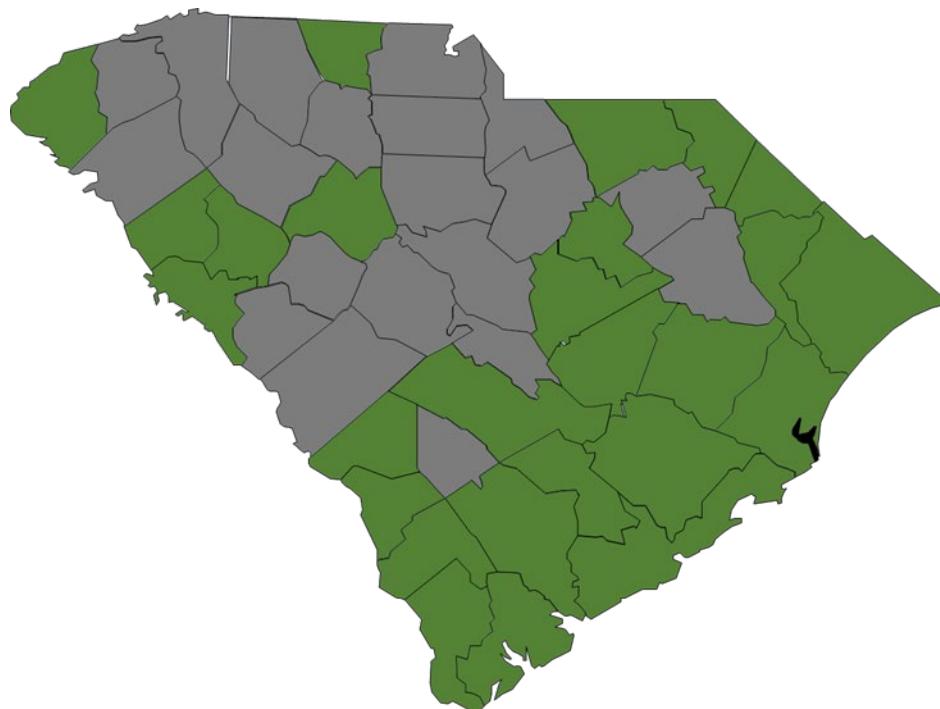
**Figure 4: Local Area GDP Growth, 2014-2015**

Source: U.S. Bureau of Economic Analysis

A regional depiction of South Carolina showing local area GDP growth from 2014-2015.

More recent data at the local level is available for both employment and wage growth. As anticipated, areas of the state that have typically relied more heavily on manufacturing did not experience as much employment growth between 2017 and 2018. Areas in Figure 5 shaded in dark green represent counties with

only one county in the state, Bamberg, saw employment declines. The coastal communities continued to experience stronger than average employment growth as the service industry, particularly leisure and hospitality related jobs, continued to experience high demand.



**Figure 5: Employment Growth, 2017-2018**

Source: Local Area Unemployment Statistics, Non-Seasonally Adjusted

In terms of average annual earnings growth, the major metropolitan areas of the state have experienced the greatest levels of growth since 2015. Figure 6 provides the average hourly earnings by Metropolitan Statistical Area (MSA) for both December 2015 and 2018. The highest overall wages in the state occur in the Charlotte and

Charleston metro areas followed by Spartanburg and Augusta. The Myrtle Beach and Sumter MSAs typically have the lowest average wages among all metro areas.

**Figure 6: Average Hourly Earnings, All Private Employees, Dec 2015 & 2018**

MSA	DECEMBER 2015	DECEMBER 2018	2015-2018 ANNUALIZED GROWTH	MIT LIVING WAGE ESTIMATE [1]
AUGUSTA	\$23.09	\$24.14	+1.5%	\$26.78/\$14.73
CHARLESTON	\$23.33	\$27.02	+5.0%	\$27.34/\$15.02
CHARLOTTE	\$25.76	\$29.25	+4.3%	\$28.43/\$15.55
COLUMBIA	\$22.66	\$23.45	+1.1%	\$26.29/\$14.50
FLORENCE	\$18.75	\$21.67	+4.9%	\$25.25/\$13.98
GREENVILLE	\$20.98	\$23.88	+4.4%	\$25.76/\$14.23
HILTON HEAD	\$20.40	\$22.43	+3.2%	\$27.29/\$15.00
MYRTLE BEACH	\$19.50	\$20.30	+1.3%	\$26.52/\$14.61
SPARTANBURG	\$20.55	\$25.00	+6.8%	\$25.31/\$14.01
SUMTER	\$19.56	\$21.27	+2.8%	\$25.51/\$14.11
STATEWIDE—S.C.	\$21.67	\$24.51	+4.2%	\$26.09/\$14.40

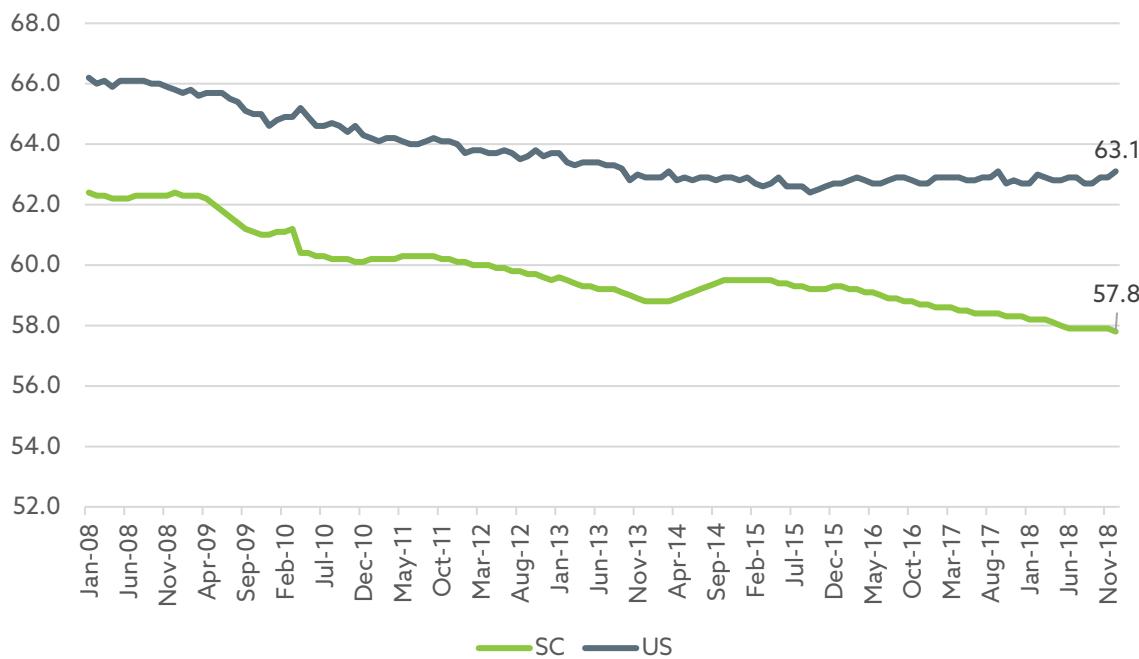
Source: State Employment, Hours, and Earnings, Non-Seasonally Adjusted

Although wage growth has been more positive in recent years, many families in the state still experience average hourly earnings that are less than what is considered a "living wage." The Massachusetts

Institute of Technology has developed a living wage calculator for each state to estimate the cost of living in a particular community or region based on typical expenses. The living wage differs based on household composition, but assuming one working adult and two children, the estimated living wage in South Carolina is \$26.09/hour. The living wage estimates by MSA are shown in Figure 6. In the majority of MSAs the average hourly wage for one working adult with two children is insufficient to cover typical expenses.

### Labor Force Participation

South Carolina has consistently experienced lower labor force participation than the U.S. as a whole. In January 2008, the S.C. rate was 62.4 percent compared to the U.S. rate of 66.2 percent. This labor force participation gap remained fairly consistent through 2013 before narrowing slightly between 2014 and 2015. However, since 2015 the rates have begun once again to diverge. With the anecdotal evidence of a labor shortage developing in the state, the continued decline in the labor force participation is an area of concern.

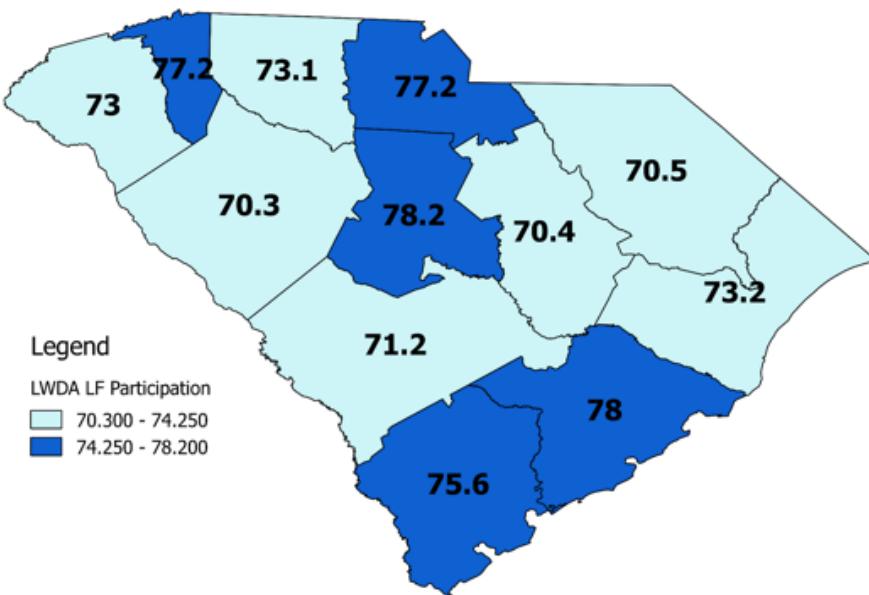


A line graph comparing US and SC labor force participation rates from January 2008 to July 2018.

**Figure 7: Labor Force Participation Rates, 2008-2018**

Source: Bureau of Labor Statistics, Seasonally-Adjusted

Labor force participation also differs across the state with more rural areas typically experiencing lower levels than more urban and suburban areas. Using data from the American Community Survey, 5-Year Estimates (2013-2017), the Midlands had the highest labor force participation rate for the population aged 20 to 64 followed by Trident and Catawba. The areas with the lowest rates were Upper Savannah, Santee-Lynches, and Pee Dee. Figure 8 shows the highest labor force participation rates in the traditional metropolitan areas of the state.



**Figure 8: Labor Force Participation Rates, 2013-2017**

Source: American Community Survey 5-Year Estimates, 2013-2017

A regional map of South Carolina displaying labor force participation rates from 2013-2017.

### Current and Future Employment by Industry

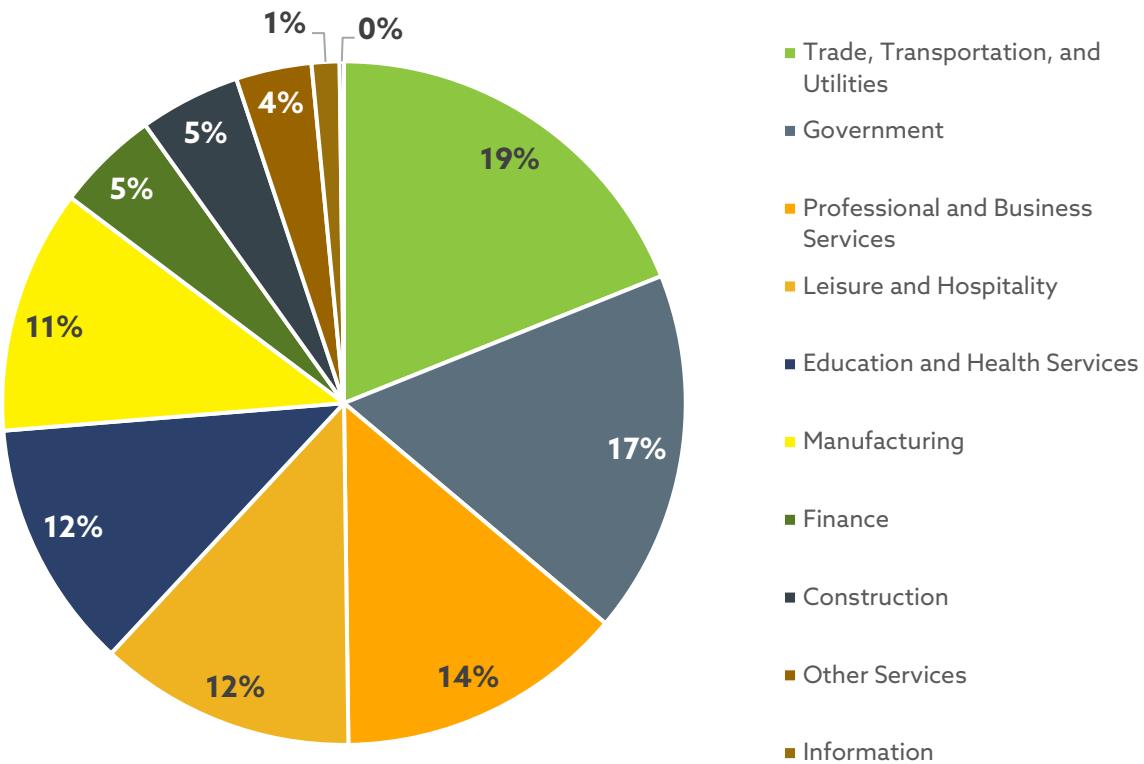
South Carolina currently has a high concentration of employment in the following industrial super sectors:

- Trade, Transportation, and Utilities
- Government
- Professional and Business Services

These three industries represent over 50 percent of non-farm employment in South Carolina in 2018.

**Figure 9: South Carolina Non-Farm Industry Employment, 2018**

Source: State Employment, Hours, and Earnings, Non-Seasonally Adjusted



The latest statewide industry employment projections cover the 10-year period 2016-2026. Overall, the state is expected to grow by 11.9 percent, or by 245,900 jobs over that time period.

There is expected to be little change in the general distribution of employment among the super sectors presented in Figure 9 between 2016 and 2026. However, at a slightly lower level of disaggregation, there is expected to be a swap between Retail Trade and Health Care and Social Assistance for the state's largest industry by employment. The industries with the largest number of projected new jobs will be Health Care and Social Assistance (+52,000); Accommodation and Food Services (+45,000); and Administrative and Support and Waste Management (+29,000). Two industries are projected to contract through 2026, Agriculture, Forestry, Fishing and Hunting and Mining. Overall, these two industries are expected to decline by approximately 4,600 jobs. Figure 10 provides the detailed industry employment projections for the state.

**Figure 10: S.C. Industry Employment Projections**

INDUSTRY CODE	INDUSTRY TITLE	ESTIMATED 2016 EMPLOYMENT	PROJECTED 2026 EMPLOYMENT	NUMERIC CHANGE	PERCENT CHANGE
000000	Total All Industries	2,072,388	2,318,285	245,897	11.9%
110000	Agriculture, Forestry, Fishing and Hunting	38,073	33,505	-4,568	-12.0%
210000	Mining	1,461	1,421	-40	-2.7%
220000	Utilities	12,377	12,463	86	0.7%
230000	Construction	94,341	106,713	12,372	13.1%
310000	Manufacturing	238,195	250,200	12,005	5.0%
420000	Wholesale Trade	71,774	81,378	9,604	13.4%
440000	Retail Trade	246,756	266,624	19,868	8.1%
480000	Transportation and Warehousing	62,893	79,589	16,696	26.5%
510000	Information	27,082	28,772	1,690	6.2%
520000	Finance and Insurance	68,155	73,211	5,056	7.4%
530000	Real Estate and Rental and Leasing	29,296	34,237	4,941	16.9%
540000	Professional, Scientific, and Technical Services	93,458	105,874	12,416	13.3%
550000	Management of Companies and Enterprises	17,893	20,503	2,610	14.6%
560000	Administrative and Support and Waste Management	158,037	187,212	29,175	18.5%
610000	Educational Services	168,072	183,258	15,186	9.0%
620000	Health Care and Social Assistance	243,973	295,962	51,989	21.3%
710000	Arts, Entertainment, and Recreation	29,373	32,273	2,900	9.9%
720000	Accommodation and Food Services	217,852	263,148	45,296	20.8%
810000	Other Services	98,596	103,611	5,015	5.1%
900000	Government	154,731	158,331	3,600	2.3%

Source: S.C. Dept. of Employment and Workforce, Industry Employment Projections Program

### Current and Future Employment by Occupation

According to the 2018 Occupational Employment Statistics program, South Carolina had 2.062 million wage and salary occupational employees with an average hourly wage of \$20.78. The largest occupational category in the state in 2018 was Office and Administrative Support with roughly 209,500 employees. These occupations were associated with wages that were significantly below the state average. The three largest occupational sectors in the state all had below average wages and represented approximately 36 percent of all workers in S.C.

Occupational categories with the highest average hourly wages were Management (\$49.57), Architecture and Engineering (\$38.44), and Computer and Mathematical (\$35.59). These three occupation groups jointly encompass about 8.2 percent of all workers in the state.

**Figure 11: S.C. Occupational Employment and Wages, 2018**

OCCUPATIONAL CODE	OCCUPATIONAL TITLE	TOTAL EMPLOYMENT	HOURLY MEAN WAGE	HOURLY MEDIAN WAGE
00-0000	All Occupations	2,062,280	\$20.78	\$16.23
11-0000	Management Occupations	89,190	\$49.57	\$42.97
13-0000	Business and Financial Operations Occupations	75,560	\$31.07	\$28.28
15-0000	Computer and Mathematical Occupations	39,740	\$35.59	\$33.48
17-0000	Architecture and Engineering Occupations	40,400	\$38.44	\$36.43
19-0000	Life, Physical, and Social Science Occupations	9,350	\$31.45	\$28.38
21-0000	Community and Social Service Occupations	25,090	\$20.75	\$18.64
23-0000	Legal Occupations	13,800	\$35.13	\$26.55
25-0000	Education, Training, and Library Occupations	114,270	\$23.10	\$21.97
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	18,760	\$23.34	\$18.49
29-0000	Healthcare Practitioners and Technical Occupations	125,690	\$35.12	\$28.19
31-0000	Healthcare Support Occupations	54,750	\$13.98	\$12.60
33-0000	Protective Service Occupations	47,820	\$18.59	\$17.25
35-0000	Food Preparation and Serving-Related Occupations	209,530	\$10.53	\$9.29
37-0000	Building and Grounds Cleaning and Maintenance Occupations	70,960	\$12.10	\$10.98
39-0000	Personal Care and Service Occupations	59,510	\$11.64	\$9.99

OCCUPATIONAL CODE	OCCUPATIONAL TITLE	TOTAL EMPLOYMENT	HOURLY MEAN WAGE	HOURLY MEDIAN WAGE
41-0000	Sales and Related Occupations	227,570	\$16.63	\$11.84
43-0000	Office and Administrative Support Occupations	304,960	\$16.81	\$15.48
45-0000	Farming, Fishing, and Forestry Occupations	4,060	\$17.45	\$15.40
47-0000	Construction and Extraction Occupations	83,040	\$19.82	\$17.99
49-0000	Installation, Maintenance, and Repair Occupations	95,050	\$21.50	\$20.13
51-0000	Production Occupations	199,480	\$18.75	\$17.20
53-0000	Transportation and Material Moving Occupations	153,680	\$16.29	\$14.34

Source: Occupational Employment Statistics Program, 2018

Using data from The Conference Board, Help Wanted Online Data Series, it is possible to determine the most “in-demand” jobs over the twelve month period from May 2018 through April 2019. Given that Retail Trade and Health Care and Social Assistance are among the top industries in-demand in the state, it is not surprising that the most in-demand occupations include Registered Nurses, Nursing Assistants, Retail Salespersons, Supervisors of Retail Sales Workers, and Stock Clerks. A full list of the top 25 “in-demand” occupations are shown in Figure 12.

**Figure 12: S.C. Top 25 In-Demand Occupations over a 12-Month Period May 2018 – April 2019**

OCCUPATION CODE	OCCUPATION TITLE	S.C. 2018 AVERAGE HOURLY WAGE
29-1141	Registered Nurses	\$31.22
41-1011	First-Line Supervisors of Retail Sales Workers	\$19.61
41-2031	Retail Salespersons	\$12.70
53-3032	Heavy and Tractor-Trailer Truck Drivers	\$21.28
43-4051	Customer Service Representatives	\$15.54
35-1012	First-Line Supervisors of Food Preparation and Serving Workers	\$15.65
43-5081	Stock Clerks and Order Fillers	\$12.75
49-9071	Maintenance and Repair Workers, General	\$17.72
41-2011	Cashiers	\$9.69
43-1011	First-Line Supervisors of Office and Administrative Workers	\$25.33
31-1014	Nursing Assistants	\$12.21

OCCUPATION CODE	OCCUPATION TITLE	S.C. 2018 AVERAGE HOURLY WAGE
53-3033	Light Truck or Delivery Services Drivers	\$15.58
21-1093	Social and Human Service Assistants	\$15.22
35-3021	Combined Food Preparation and Serving Workers	\$9.09
29-1069	Physicians and Surgeons, All Other	\$89.04
33-9032	Security Guards	\$15.86
15-1142	Network and Computer Systems Administrators	\$36.36
17-2112	Industrial Engineers	\$41.86
11-1021	General and Operations Managers	\$48.75
51-1011	First-Line Supervisors of Production and Operating Workers	\$32.15
11-9111	Medical and Health Services Managers	\$47.49
41-3099	Sales Representatives, Services, All Other	\$23.88
37-2012	Maids and Housekeeping Cleaners	\$9.87
29-1123	Physical Therapists	\$41.08
35-2014	Cooks, Restaurant	\$11.38

Source: Job Postings: The Conference Board, *Health Wanted Online® Data Series*;

#### Wages: U.S. Bureau of Labor Statistics

Other in-demand occupations are in line with the large manufacturing and tourist industries that South Carolina enjoys, such as Truck Drivers, Maintenance Workers, Supervisors of Production Workers, Cashiers, and Maids.

Through the year 2026, both Food Preparation and Serving-Related Occupations as well as Office and Administrative Support Occupations will continue to remain in high demand as their employment levels are expected to increase by 40,748 and 37,442, respectively. The only occupation group expected to contract over the next decade is Farming, Fishing, and Forestry. Figure 13 provides the statewide occupational projections through 2026. Through a combination of economic growth as well as job replacement (e.g., retirement), the state will have approximately 284,000 annual job openings across all occupations.

**Figure 13: S.C. Occupational Employment Projections, 2016-2026**

OCCUPATIONAL CODE	OCCUPATIONAL TITLE	ESTIMATED 2016 EMPLOYMENT	PROJECTED 2026 EMPLOYMENT	NUMERIC CHANGE	PERCENT CHANGE	ANNUAL TOTAL OPENINGS
00-0000	All Occupations	2,205,704	2,462,025	256,321	11.6%	284,336
11-0000	Management Occupations	127,849	137,823	9,974	7.8%	11,214

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OCCUPATIONAL CODE	OCCUPATIONAL TITLE	ESTIMATED 2016 EMPLOYMENT	PROJECTED 2026 EMPLOYMENT	NUMERIC CHANGE	PERCENT CHANGE	ANNUAL TOTAL OPENINGS
13-0000	Business and Financial Operations	86,283	98,373	12,090	14.0%	9,370
15-0000	Computer and Mathematical Occupations	39,597	45,397	5,800	14.6%	3,350
17-0000	Architecture and Engineering Occupations	39,528	45,055	5,527	14.0%	3,539
19-0000	Life, Physical, and Social Science Occupations	10,547	11,445	898	8.5%	1,061
21-0000	Community and Social Service Occupations	29,911	33,785	3,874	13.0%	3,719
23-0000	Legal Occupations	15,401	17,126	1,725	11.2%	1,224
25-0000	Education, Training, and Library Occupations	114,248	126,874	12,626	11.1%	11,265
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	25,317	27,205	1,888	7.5%	2,736
29-0000	Healthcare Practitioners and Technical Occupations	124,135	145,742	21,607	17.4%	9,233
31-0000	Healthcare Support Occupations	57,480	71,496	14,016	24.4%	8,548
33-0000	Protective Service Occupations	50,390	53,792	3,402	6.8%	5,424
35-0000	Food Preparation and Serving-Related Occupations	199,899	240,664	40,765	20.4%	40,748
37-0000	Building and Grounds Cleaning and Maintenance Occupations	89,163	103,163	14,000	15.7%	13,349

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OCCUPATIONAL CODE	OCCUPATIONAL TITLE	ESTIMATED 2016 EMPLOYMENT	PROJECTED 2026 EMPLOYMENT	NUMERIC CHANGE	PERCENT CHANGE	ANNUAL TOTAL OPENINGS
39-0000	Personal Care and Service Occupations	76,554	89,122	12,568	16.4%	13,736
41-0000	Sales and Related Occupations	242,602	266,021	23,419	9.7%	37,196
43-0000	Office and Administrative Support Occupations	311,704	328,204	16,500	5.3%	37,442
45-0000	Farming, Fishing, and Forestry Occupations	23,738	20,899	-2,839	-12.0%	2,982
47-0000	Construction and Extraction Occupations	91,604	102,607	11,003	12.0%	10,943
49-0000	Installation, Maintenance, and Repair Occupations	98,812	110,723	11,911	12.1%	10,989
51-0000	Production Occupations	198,592	209,334	10,742	5.4%	23,924
53-0000	Transportation and Material Moving Occupations	152,350	177,175	24,825	16.3%	22,346

Source: S.C. Department of Employment and Workforce, Occupational Employment Projections Program

The occupation groups expected to grow the fastest, in terms of percentage growth, include Healthcare Support (+24.4%), Food Preparation and Serving-Related (+20.4%), and Healthcare Practitioners and Technical (+17.4%). In terms of specific occupations expected to grow fastest through 2026, this includes Home Health Aides, Physician Assistants, and Nurse Practitioners. Occupations expected to decline in the near future include Respiratory Therapy Technicians, Word Processors and Typists, and Fallers. Most of the occupations expected to decline through 2026 are likely to be eliminated due to increased automation and technical advances.

**Figure 14: Statewide Projected Fastest Growing and Declining Occupations, 2016-2026**

RANK	FASTEST GROWING	FASTEST DECLINING
1	Home Health Aides	Respiratory Therapy Technicians
2	Physicians Assistants	Word Processors and Typists
3	Nurse Practitioners	Fallers

RANK	FASTEST GROWING	FASTEST DECLINING
4	Statisticians	Computer Operators
5	Personal Care Aides	Legal Secretaries
6	Operations Research Analysts	Data Entry Keyers
7	Software Developers, Applications	Switchboard Operators, Including Answering Service
8	Physical Therapist Aides	Coin, Vending, and Amusement Machine Servicers and Repairers
9	Medical Assistants	Farmers, Ranchers, and Other Agricultural Managers
10	Respiratory Therapists	Executive Secretaries and Executive Administrative Assistants
11	Combined Food Preparation and Serving Workers	Farmworkers, Farm, Ranch, and Aquacultural Animals
12	Physical Therapist Assistants	Logging Equipment Operators
13	Massage Therapists	Engine and Other Machine Assemblers
14	Physical Therapists	Photographers
15	Health Specialties Teachers, Postsecondary	Farmworkers and Laborers, Crop, Nursery, and Greenhouse
16	Machine Feeders and Offbearers	Nuclear Power Reactor Operators
17	Occupational Therapists	Electrical and Electronic Equipment Assemblers
18	Health Technologists and Technicians, All Other	Agricultural Equipment Operators
19	Security and Fire Alarm Systems Installers	Structural Metal Fabricators and Filters
20	Mental Health Counselors	Chemical Plant and System Operators

Source: S.C. Dept. of Employment and Workforce, Occupational Employment Projections Program

**Note:** Fastest growing by percent increase with at least 100 new positions; fastest declining by percent decrease with at least 50 fewer positions.

### Employer Needs

Understanding industry requirements for jobs is crucial to keep the state's economy growing. The knowledge, skills, and abilities required for today's jobs vary greatly by occupation. This section highlights the education level of the workforce that is currently demanded by employers, presents several comparisons of employer needs in terms of education, and gives an assessment of the state's workforce in ability to meet those needs. It also highlights the certification and licenses mostly commonly requested by employers in recent job postings.

#### Demand for Education

Nationwide there is a lack of clarity on the best way to measure the demand for education. The BLS produces a listing of the typical level of education that is needed for entry into over 800 detailed occupations but does not necessarily advocate using those as the sole measure of educational demand. The goal of their system is to provide career advice to students as well as for individuals who are interested in switching careers. The actual distribution of educational attainment within each occupation can be significantly different than the educational

requirement category listed by BLS (e.g., in 2012-2013 5.4 percent of fast food cooks held a bachelor's degree or higher).

Despite these limitations, the BLS educational requirements by occupation represent one method for attempting to determine potential educational demand in South Carolina. However, these estimates and any conclusions drawn from these estimates should be approached with caution.

Educational requirements can be grouped into four general categories: less than high school, high school diploma or equivalent, some college or associate's degree, and bachelor's degree or higher. According to measures of labor demand from the BLS, just under 21 percent of jobs in South Carolina require a bachelor's degree or higher while just under 60 percent of jobs require only a high school diploma or less. Eleven percent of jobs require some college or an associate's degree.

**Figure 15: S.C. Jobs by Education Level Required, 2018**

EDUCATION	OES EMPLOYMENT	OES PERCENT	GEOSOL JOB POSTINGS	GEOSOL PERCENT
LESS THAN HIGH SCHOOL	544,350	27%	21,585	16%
HIGH SCHOOL DIPLOMA OR EQUIVALENT	853,240	42%	65,698	50%
SOME COLLEGE OR ASSOCIATE'S DEGREE	226,980	11%	12,105	9%
BACHELOR'S DEGREE OR HIGHER	423,640	21%	33,266	25%
<b>TOTAL</b>	<b>2,048,210</b>	<b>100%</b>	<b>132,654</b>	<b>100%</b>

Source: U.S. Bureau of Labor Statistics, Occupational Employment Survey (OES); Geographic Solutions, Inc.

Using data from Geographic Solutions' online job postings, it appears slightly more occupations were in demand that required at least some college, however this may be the result of selection bias. If employers believe that the type of worker they need for their job is not likely to search online job postings, there may be fewer of these types of jobs posted.

### Requested Certifications and Soft Skills

In addition to education, employers often require, recommend, or suggest specific certifications they would like for an ideal job candidate to possess. Figure 16 presents the findings from an analysis of online job postings from November 2014 to October 2015 in regards to preferred certifications. Individual and commercial driver's licenses are the most commonly requested certifications followed by certified registered nurse and basic life support.

These same job postings were also examined for the various soft/hard skills that employers typically request from candidates. Soft skills are those attributes not defined by technical accomplishments or certifications attained. They are interpersonal skills or character traits that define an individual. The analysis shows that in-demand soft skills include communication skills, integrity, team-orientation, detail-orientation, problem solving skills, and self-motivation.

**Figure 16: Top 10 Employer-Requested Soft Skills and Certifications in S.C.**

SOFT/HARD SKILLS	CERTIFICATION
ORAL AND WRITTEN COMMUNICATION	Driver's License
INTEGRITY	Commercial Driver's License
MARKETING	Certified Registered Nurse
TEAM-ORIENTED, TEAMWORK	Basic Life Support
MICROSOFT OFFICE	HAZMAT
DETAIL ORIENTED	Certification in Cardiopulmonary Resuscitation
CUSTOMER SERVICE ORIENTED	Occupational Safety & Health Administration Certification
PROBLEM SOLVING	Continuing Education
ORGANIZATIONAL SKILLS	Food safety programs
SELF-STARTING/SELF-MOTIVATED	Licensed Practical Nurse

Source: *The Conference Board, Help Wanted Online®*

#### Manufacturing Survey and Supply Gap Analysis

In a survey conducted in 2017 by the Department of Commerce, manufacturers were given the opportunity to provide feedback on their workforce concerns. The survey found that companies are least concerned about filling their entry-level positions and positions that require a high school diploma. They are most concerned about positions that require four to ten years of experience or special skills certifications, and management positions. Key takeaways from the survey reinforce the need for middle-level skills.

An additional analysis completed in 2017 compared regional staffing patterns, educational attainment data from postsecondary institutions, and employment projections from the Department of Employment and Workforce to determine whether there appeared to be an over or under supply of workers in five sectors of interest for the state: Business and IT Services; Construction; Diversified Manufacturing; Healthcare; and Transportation, Logistics, and Warehousing.

Figure 17 presents a selection of the occupations in each sector that showed the largest potential imbalances between projected worker demand and projected worker supply. Next steps include vetting these findings with industry leaders and crafting policies to address imbalances.

**Figure 17: Projected Worker Supply and Demand in Selected Occupations**

SOC	DESCRIPTION	PROJECTED GAP
<b>BUSINESS AND IT SERVICES</b>		
11-3021	Computer and Information Systems Managers	135
15-1152	Computer Network Support Specialists	71
15-1133	Software Developers, Systems Software	70
49-9071	Maintenance and Repair Workers, General	(253)

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SOC	DESCRIPTION	PROJECTED GAP
51-2092	Team Assemblers	(395)
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	(602)
<b>CONSTRUCTION</b>		
26-1198	Construction Managers	3,460
51-4121	Welders, Cutters, Solderers, and Brazers	244
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	177
47-2073	Operating Engineers and Other Construction Equipment Operators	(105)
47-2031	Carpenters	(130)
47-2061	Construction Laborers	(398)
<b>DIVERSIFIED MANUFACTURING</b>		
51-4121	Welders, Cutters, Solderers and Brazers	156
51-4081	Multiple Machine Tool Setters, Operators, and Tenders, Metal and Plastic	76
51-4031	Cutting, Punching, and Press Machine Setters, Operators, and Tenders, Metal and Plastic	75
49-9071	Maintenance and Repair Workers, General	(401)
51-2092	Team Assemblers	(627)
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	(955)
<b>HEALTHCARE</b>		
31-9092	Medical Assistants	1,301
29-2061	Licensed Practical and Licensed Vocational Nurses	547
39-9021	Personal Care Aides	(472)
31-1011	Home Health Aides	(554)
31-1014	Nursing Assistants	(578)
31-9092	Medical Assistants	1,301
<b>TRANSPORTATION, LOGISTICS, AND WAREHOUSING</b>		
49-3011	Aircraft Mechanics and Service Technicians	29
53-3041	Taxi Drivers and Chauffeurs	1
49-9071	Maintenance and Repair Workers, General	(235)
51-2092	Team Assemblers	(368)
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	(560)

Source: South Carolina Focus Industry Demand Supply Gap Analyses, Oct 2017

A broader analysis of the supply and demand gap statewide is shown below. This analysis compares the number of student completions from public and private postsecondary institutions to projected annual job openings that require education beyond high school. The

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openings shows those occupations requiring more than a high school education, as defined by the U.S. Bureau of Labor Statistics. The information is also matched to one of 16 education-based career clusters.

Note that the BLS assignment of the typical educational requirements is for entry into an occupation and may not include all paths of entry. Many positions require higher levels of education than the level assigned by BLS. In addition, changing entry requirements for some occupations may lead to more educated individuals entering jobs than those who already hold a similar position (e.g., registered nurses typically required a two-year associate's degree but many hospitals now require a four-year bachelor's degree).

**Figure 18: South Carolina Postsecondary Completers by Career Cluster, 2015-2016 (Labor Supply)**

CAREER CLUSTER	LESS THAN 4 YEARS	BACHELOR'S DEGREE	MASTER'S DEGREE	DOCTORAL OR PROFESSIONAL DEGREE	TOTAL
AGRICULTURE, FOOD & NATURAL RESOURCES	236	378	40	22	675
ARCHITECTURE & CONSTRUCTION	974	169	57	5	1,205
ARTS, AUDIO/VIDEO TECHNOLOGY & COMMUNICATIONS	237	2,267	148	30	2,682
BUSINESS MANAGEMENT & ADMINISTRATION	1,662	3,650	1,236	10	6,558
EDUCATION & TRAINING	4,908	4,498	1,917	138	11,461
FINANCE	424	1,502	166	-	2,092
GOVERNMENT & PUBLIC ADMINISTRATION	10	872	91	8	981
HEALTH SCIENCE	6,517	2,239	755	947	10,457
HOSPITALITY & TOURISM	431	489	26	16	962
HUMAN SERVICES	2,239	2,143	686	57	5,125
INFORMATION TECHNOLOGY	912	743	119	17	1,791
LAW, PUBLIC SAFETY, CORRECTIONS & SECURITY	666	776	60	336	1,838
MANUFACTURING	2,214	21	-	-	2,235
MARKETING	180	1,288	23	-	1,491
SCIENCE, TECHNOLOGY, ENGINEERING & MATHEMATICS	88	6,093	883	307	7,371
TRANSPORTATION, DISTRIBUTION & LOGISTIC	999	16	11	-	1,026
<b>GRAND TOTAL</b>	<b>22,696</b>	<b>27,144</b>	<b>6,218</b>	<b>1,892</b>	<b>57,950</b>

Source: Institute of Education Sciences (IES), Integrated Postsecondary Education Data System (IPEDS)

**Figure 19: South Carolina Projected Average Annual Job Openings Requiring Postsecondary Education (Labor Demand)**

CAREER CLUSTER	LESS THAN 4 YEARS	BACHELOR'S DEGREE	MASTER'S DEGREE	DOCTORAL OR PROFESSIONAL DEGREE	TOTAL
AGRICULTURE, FOOD & NATURAL RESOURCES	124	274	-	-	398
ARCHITECTURE & CONSTRUCTION	914	1,561	-	-	2,475
ARTS, AUDIO/VIDEO TECHNOLOGY & COMMUNICATIONS	640	982	-	-	1,622
BUSINESS MANAGEMENT & ADMINISTRATION	2,850	8,624	-	-	11,474
EDUCATION & TRAINING	2,524	6,759	1,705	1,559	12,547
FINANCE	12	3,710	-	-	3,722
GOVERNMENT & PUBLIC ADMINISTRATION	-	767	38	-	805
HEALTH SCIENCE	8,080	4,112	625	1,162	13,979
HOSPITALITY & TOURISM	64	-	-	-	64
HUMAN SERVICES	1,584	1,447	895	124	4,050
INFORMATION TECHNOLOGY	985	2,178	-	-	3,163
LAW, PUBLIC SAFETY, CORRECTIONS & SECURITY	1,647	72	-	470	2,189
MANUFACTURING	1,421	289	-	-	1,710
MARKETING	-	2,790	-	-	2,790
SCIENCE, TECHNOLOGY, ENGINEERING & MATHEMATICS	25	2,308	103	22	2,458
TRANSPORTATION, DISTRIBUTION & LOGISTIC	5,305	384	-	-	5,689
<b>GRAND TOTAL</b>	<b>26,175</b>	<b>36,257</b>	<b>3,366</b>	<b>3,337</b>	<b>69,135</b>

Source: U.S. Bureau of Labor Statistics, SCDEW, Occupational Employment Projections Program, 2016-2026

Figure 20: South Carolina Postsecondary Education Gap by Career Cluster, 2015-2016

CAREER CLUSTER	LESS THAN 4 YEARS	BACHELOR'S DEGREE	MASTER'S DEGREE	DOCTORAL OR PROFESSIONAL DEGREE	TOTAL
AGRICULTURE, FOOD & NATURAL RESOURCES	111	104	40	22	277
ARCHITECTURE & CONSTRUCTION	60	-1,392	57	5	-1,270
ARTS, AUDIO/VIDEO TECHNOLOGY & COMMUNICATIONS	-403	1,285	148	30	1,060
BUSINESS MANAGEMENT & ADMINISTRATION	-1,188	-4,974	1,236	10	-4,916
EDUCATION & TRAINING	2,384	-2,261	212	-1,421	-1,086
FINANCE	412	-2,208	166	0	-1,630
GOVERNMENT & PUBLIC ADMINISTRATION	10	105	53	8	176
HEALTH SCIENCE	-1,563	-1,873	130	-216	-3,522
HOSPITALITY & TOURISM	367	489	26	16	898
HUMAN SERVICES	655	696	-209	-67	1,075
INFORMATION TECHNOLOGY	-73	-1,435	119	17	-1,372
LAW, PUBLIC SAFETY, CORRECTIONS & SECURITY	-981	704	60	-134	-351
MANUFACTURING	793	-268	0	0	525
MARKETING	180	-1,502	23	0	-1,299
SCIENCE, TECHNOLOGY, ENGINEERING & MATHEMATICS	63	3,785	780	285	4,913
TRANSPORTATION, DISTRIBUTION & LOGISTIC	-4,306	-368	11	0	-4,663
<b>GRAND TOTAL</b>	<b>-3,479</b>	<b>-9,113</b>	<b>2,852</b>	<b>-1,445</b>	<b>-11,185</b>

Source: BLS, IES, SCDEW

This analysis indicates there is likely to be a labor shortage in a significant number of occupations requiring higher education. There are over 11,000 more projected openings than local graduates for the year. Only for occupations requiring a master's degree are there enough local supply of graduates to fill the projected need. Nine of the 16 career clusters are likely to have a supply gap. A few notable findings:

- In Business Management and Administration, there is a severe shortage at the bachelor's degree and lower level but an oversupply at the master's degree level.

- In Education and Training, there is an oversupply at the less than four-year level and a shortage at the bachelor's degree level to roughly the same magnitude. Students are taking general or multidisciplinary studies below the bachelor's degree level, while a myriad of positions have openings at the next level, including many teaching positions. There are numerous openings for postsecondary teachers at the doctorate level as well.
- In Finance, there are over 2,200 more openings than graduates at the bachelor's degree level.
- In Health Science, there is a labor shortage at the lower half of the educational spectrum. Most of the openings below the bachelor's degree are for assistants and technicians, while three-fourths of the openings for bachelor's degree are for registered nurses. With the growing demand for health care workers due to demographic shifts, this shortage may worsen in the coming years.
- In Transportation, Distribution, and Logistics, there is a severe shortage below the bachelor's degree level with 70 percent of the openings being for heavy and tractor-trailer truck drivers.

Note that this analysis does not consider the flow of additional graduates from other states who move to South Carolina nor graduates of this state that move elsewhere post-graduation.

## Continued Challenges

### Barriers to Employment

With the state unemployment rate reaching historically low levels, there are fewer and fewer individuals available to take newly created jobs or to fill positions vacated by retiring workers. This presents both a challenge and opportunity for the state. Many individuals who remain unemployed or out of the labor force face varying challenges and barriers that may need more specific or dedicated services to meet their employment and training needs. The state is pursuing effective programs to tackle the broad spectrum of needs as a result of these barriers and will continue to develop more effective programs in partnership with businesses, community-based organizations and non-profits.

### *Juvenile Offenders*

In Fiscal Year (FY) 2016-17, the S.C. Department of Juvenile Justice (DJJ) handled 13,591 new cases, down from 15,429 in 2015-2016. The top five offenses putting a person into DJJ custody are assault and battery, shoplifting, public disorderly conduct, simple marijuana possession and disturbing school.

DJJ's Career Readiness Center (CRC) had a total enrollment of 1,423 for its training classes in FY 2016-17. Students at JRTC took classes in financial literacy, culinary arts, leadership, interviewing skills, public speaking, interpersonal skills, and in many other areas related to life skills and job placement. During FY 2016-17, 901 youth completed job-readiness training in DJJ's 16 community job-readiness training sites, located throughout the state. DJJ doubled its number of training sites from the previous fiscal year and nearly doubled the number of participants.[2]

### *Homelessness*

South Carolina's homeless population was estimated at 3,082 people in 2018, including 415 veterans, according to the U.S. Department of Housing and Urban Development. The total number of homeless increased 0.4 percent from 2017 but is down 12.1

percent compared to 2010. For 2018, eight out of every 10,000 SC residents experienced homelessness.[3]

According to the National Alliance to End Homelessness, the first step in supporting the homeless population is to get them into housing. The Alliance suggests rapid rehousing because, "By connecting people with a home, they are in a better position to address other challenges that may have led to their homelessness, such as obtaining employment or addressing substance abuse issues." [4]

### ***Veterans***

According to the 2017 American Community Survey, South Carolina had 362,000 civilian veterans aged 18 or older, comprising 9.3 percent of the state's civilian adult population. Veterans had a higher percentage having some college education or an associate's degree compared to the population aged 25 and older as a whole (37.7 percent for veterans, 29.8 percent for all). Veterans had a lower unemployment rate at 4.5 percent than the civilian population aged 18 to 64 (5.7 percent).[5]

Veterans may have to overcome stereotypes employers may have such as thinking that all post-9/11 veterans have post-traumatic stress disorder (PTSD). However, veterans have a great deal to contribute to any company. Many veterans have job skills that transfer directly to the civilian world, such as integrity, attention to detail, leadership, problem solving, and a team-player mentality.

### ***Ex-Offenders***

As of June 30, 2018, South Carolina had an inmate population of 18,958. For the FY 2018 (July 1, 2017 – June 30, 2018), the S.C. Department of Corrections (SCDC) had 8,585 total releases from its base population. The average age of an inmate was 38.5 years old. African-Americans made up 60 percent of the total with whites at 37 percent and other races at 3 percent. The average sentence length is 14 years. Forty-nine percent of inmates do not have a high school diploma or GED upon incarceration.[6]

The SCDC had numerous individuals reaching achievements in FY 2018, including 324 GED/High School Diplomas earned and 2,333 vocational certificates earned. The SCDC has been authorized as a Department of Labor (DOL) Apprenticeship site, awarding 36 DOL apprenticeship credentials in FY 2018 and 636 WorkKeys certificates.

Beginning July 1, 2018, SCDC, in partnership with the Department of Employment and Workforce, transitioned to the new WIN Learning – Ready to Work certification program. WIN replaced WorkKeys with similar skills assessment (Applied Math, Reading for Information, and Locating Information), while adding a soft skills component that will be of profound benefit to inmates post-release.[7]

People who have been imprisoned face several challenges re-entering society, such as overcoming their past criminal history when seeking employment. Lack of education, poor computer skills, poor people skills, low self-esteem, substance abuse problems, and access to reliable transportation are problems that may be faced by an ex-offender during the job search.

### ***Low-Income***

In 2017, South Carolina had an estimated 752,000 people living below the poverty level or 15.4 percent of the population for whom poverty status is determined. Of this group, nearly 170,000 were employed, and 44,000 were unemployed.[8] Government and educational assistance can help many in this population raise their income to sustaining levels.

*Individuals with Disabilities*

The diversity of disabilities ranges from those seen such as necessitating the use of a wheelchair or cane, to those unseen, invisible disabilities such as mental illness or substance use disorders. Although many innovative programs and collaborative efforts are in place in South Carolina to expand competitive, integrated employment opportunities for individuals with disabilities, data shows that a continued focus on increasing rates of employment and labor force participation is necessary.

Estimates from the American Community Survey in 2017 show that 14.8 percent of the state's civilian, non-institutionalized population was disabled.[9] The disabled employed equaled nearly 123,000 people aged 18 to 64. Nearly 18,600 more people were unemployed, yielding a disabled unemployment rate of 13.2 percent, substantially in excess of the state's average unemployment levels. Ambulatory difficulty was the most common disability for both those employed and those not in the labor force, while a cognitive difficulty was reported as the most common disability for those who were unemployed.[10] Therefore, this group will continue to need focused services to overcome substantial barriers to employment.

**College Graduation Debt and Retention**

A recent 2017 study analyzed the effects of rising post-secondary education costs in comparison to the levels of debt that South Carolinians are taking on and determined the employment outcomes of recent college graduates. Two cohorts of South Carolina college graduates were studied to determine: (1) the percentage of students found working in the state one and five years post-graduation, (2) their annual earnings, (3) their median earnings one and five years post-graduation, and (4) their industry of employment one and five years post-graduation.

Major findings of that report showed:

- 64.9 percent of South Carolina college graduates from FY2009-10 were employed one-year post-graduation, and 50.0 percent were employed five years post-graduation
- Women, African-Americans, in-state students, and those pursuing less than a bachelor's degree were more likely to be found in wage records in S.C. one and five years post-graduation. Students majoring in Science, Technology, Engineering, or Math (STEM) fields were the least likely to be found in wages records post-graduation.
- Retention rates were higher for students that are native to South Carolina (78.6 percent) than those from out-of-state (50.2 percent).
- STEM graduates had the fastest median annual wage growth (9.6 percent) one to five years post-graduation; Trades was second (8.2 percent); and third was Business and Communication (8.1 percent).
- The college majors associated with South Carolina's Talent Pipeline Initiative[11] showed either above average wages (\$35,238) one-year post-graduation or higher than average wage growth (6.3 percent per year) between the first and fifth years. Many of the fields of study funded through the Workforce Innovation and Opportunity Act (WIOA) will likely have similar wage outcomes.

## CONCLUSION

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South Carolina has experienced very strong economic growth since emerging from the effects of the Great Recession in 2010. The state's unemployment rate remains below that of the national average and strong wage growth is helping to buoy both the housing market and tourism industries, both important sectors for the state.

The state is now in a position of having to contend with slowing growth not due to a lack of demand but due to a lack of additional workers able to take jobs in expanding businesses. In addition to the perennial concerns of finding skilled workers, many businesses are now reporting trouble finding and retaining any type of worker. This brings about a new set of challenges on how to engage with individuals who may have previously left the workforce or those in the labor force with barriers to employment.

South Carolina must work to ensure an ability of the workforce to meet the demands of both current and future job opportunities at all education and skill levels. The state also has an opportunity to continue to expand work in rural areas where there may be additional supply of workers and whose local areas have not reached the same level of income or employment growth as those of the metropolitan regions.

[1] First estimate assumes a household with one adult working with two children; the second estimate assumes a household with two adults working with two children.

[2] South Carolina Department of Juvenile Justice, 2017 Report Card, [http://www.state.sc.us/djj/pdfs/2017%20Report%20Card\\_5.5x8.5.pdf](http://www.state.sc.us/djj/pdfs/2017%20Report%20Card_5.5x8.5.pdf)

[3] U.S. Department of Housing and Urban Development, The 2018 Annual Homeless Assessment Report (AHAR) to Congress, page 93

[4] National Alliance to End Homelessness, Rapid Re-Housing, <https://endhomelessness.org/ending-homelessness/solutions/rapid-re-housing/>, accessed on July 12, 2019

[5] U.S. Census Bureau, American Community Survey, 2017 1-Year Estimate, Table S2101: Veteran Status

[6] South Carolina Department of Corrections, SCDC FAQs July 2019, [http://www.doc.sc.gov/research/SystemOverview/SCDC\\_FAQs\\_July\\_2019.pdf](http://www.doc.sc.gov/research/SystemOverview/SCDC_FAQs_July_2019.pdf)

[7] South Carolina Department of Corrections, Accountability Report Fiscal Year 2018, Page 9, <http://www.doc.sc.gov/research/AccountabilityReportFY2018.pdf>

[8] U.S. Census Bureau, American Community Survey, 2017 1-Year Estimate, Table S1701: Poverty Status in the Past 12 Months

[9] U.S. Census Bureau, American Community Survey, 2017 1-Year Estimate, Table S1810: Disability Characteristics

[10] U.S. Census Bureau, American Community Survey, 2017 1-Year Estimate, Table S18120: Employment Status by Disability and Type

[11] The five high-demand, high growth sectors of the Talent Pipeline Initiative are Construction, Diversified Manufacturing, Business and Information Technology, Health Care, and Transportation and Logistics.

## b. Workforce Analysis

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

### 1. Vision

Describe the State's strategic vision for its workforce development system.

### 2. Goals

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—

- (A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>8</sup> and other populations.<sup>9</sup>
- (B) Goals for meeting the skilled workforce needs of employers.

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

[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

### 3. Performance Goals

Using the tables provided within each Core Program section, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

### 4. Assessment

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

#### *Vision*

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To expand and develop a skilled workforce and a responsive workforce system that meets the needs of business and industry leading to sustainable growth, economic prosperity, and regional and global competitiveness for South Carolina.

The State's vision is supplemented by four guiding principles:

- Focus solely on activities that support the mission;
- Evaluate economic and labor market data, and actively listen to an inclusive group of partners, employers, and job seekers;
- Base strategies and decisions on data and input; and
- Be accountable for outcomes that support business growth and economic opportunities for all South Carolinians.

In order to move towards this vision, the State has adopted four objectives.

### **Goals/Objectives**

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- Identify, invest in, and support educational and developmental strategies to better prepare and expand a skilled workforce for current and emerging jobs
- Align resources, policies, and strategies between state, local, and regional systems to continuously improve outcomes for businesses, partners and individuals, including individuals with barriers to employment
- Identify current and future workforce needs of South Carolina business and industry to support career pathways in growth sectors
- Engage job seekers, employers, and other workforce partners through marketing and outreach and articulate a value proposition specific to each

### **Performance Goals**

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The State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance are included in the tables provided within each Core Program section.

### ***Assessment of Overall Effectiveness of the Workforce Development System***

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South Carolina has a vast workforce development system consisting of multiple public and private partners, the goal of which is to facilitate financial stability and economic prosperity for employers, individuals, and communities. We will evaluate the overall effectiveness of our system using the following tools: WIOA common performance measures that assess employment, earnings, credential attainment, skills gain, and employer engagement; SC Works Certification Standards that assess system management, job seeker services, and employer services; and state and program-specific measures.

Assessment results will be used to support the development and provision of technical assistance, opportunities for collaboration, and resource investments. Failed measures or system feedback communicate the need for technical assistance in the form of onsite assistance, policy development, and guidance to local workforce development boards or specific programs based on the indicated need and the pervasiveness of the issues. New partnerships or deeper collaboration with core and partner programs may be needed to support or develop initiatives to answer areas of deficiency. Additionally, areas of need may warrant the investment of resources to foster greater outcomes. For example, based on system feedback, Governor's reserve funds were used to support improved technology in the job center resource rooms as well as funding SC Works 101 training, a training developed to ensure front-line staff understands fundamentals of WIOA overall and the SC Works system partners and functions.

### **c. State Strategy**

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

1. Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7) and includes registered apprenticeship. "In-demand industry sector or occupation" is defined at WIOA section 3(23)
2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2)

South Carolina will implement the following strategies to support the vision and objectives of the state workforce system:

**OBJECTIVE 1:** Identify, invest in, and support educational and developmental strategies to better prepare and expand a skilled workforce for current and emerging jobs.

- **STRATEGY 1.1** Increase participation in work-based learning activities, including registered apprenticeships.
- **STRATEGY 1.2** Increase the formal assessment of soft-skills and provision of soft skills training.
- **STRATEGY 1.3** Increase resource investment into direct services for job seekers through results-oriented discretionary grants.

**OBJECTIVE 2:** Align resources, policies, and strategies between state, local, and regional systems to improve outcomes for businesses, partners and individuals, including those with barriers to employment.

- **STRATEGY 2.1** Increase co-enrollment across partner programs.
- **STRATEGY 2.2** Develop and implement cross-partner staff training to enhance service delivery to businesses and job seekers.
- **STRATEGY 2.3** Streamline intake systems and referral processes.
- **STRATEGY 2.4** Implement strategies that increase access to reliable transportation, affordable housing and identification and vital records.
- **STRATEGY 2.5** Increase the number of regional, industry-led, sector partnerships.

**OBJECTIVE 3:** Identify current and future workforce needs of South Carolina business and industry to support career pathways in growth sectors.

- **STRATEGY 3.1** Identify the challenges and opportunities in rural communities.
- **STRATEGY 3.2** Develop career pathway tools and templates.

**OBJECTIVE 4:** Engage job seekers, employers, and other workforce partners through marketing and outreach and articulate a value proposition specific to each.

- **STRATEGY 4.1** Share best practices across partner programs in order to increase awareness of partner services, promote a workforce of growth and continuous improvement, and encourage a system viewpoint.
- **STRATEGY 4.2** Improve strategic outreach to employers.

### Strategies to Align Partner Programs & Strengthen Activities

While partnership and collaboration at the state and local levels are stronger than ever, more steps can be taken to align workforce development programs and strengthen activities for the benefit of both employers and job seekers. The weaknesses identified in the Workforce Development, Education and Training Activities Analysis are: difficulty accessing services due to barriers such as transportation and a need for greater alignment across programs to support access to multiple program services. The strategies outlined directly above support both alignment of partner programs as well as strengthening the workforce system.

Partners working together to address barriers that impact job seekers access to services (Strategy 2.4) will not only align services through the use of common tools and resources, but also address the identified system weakness. Alignment across programs was identified as an area that warrants continuous improvement by partner programs in the activities analysis. Linkages can be made to all of the state strategies in supporting alignment. However, the approaches that most directly help align partner programs include the pursuit of higher levels of co-enrollment, cross-partner staff training, streamlined intake systems and referral processes, increasing the number of active sector partnerships, and collectively addressing common barriers impeding access to workforce development activities (2.1-2.5). Additionally, sharing best practices across partners (4.1), improving the strategic outreach to employers (4.2), and developing career pathway tools and templates (3.2) are additional steps to a customer-focused system that requires a cross-partner collaborative approach in both the development and implementation of the strategies.

## **III. Operational Planning Elements**

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

### **a. State Strategy Implementation**

The Unified or Combined State Plan must include—

#### **1. State Board Functions**

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

On behalf of the Governor, the State Workforce Development Board (SWDB) provides direction to the South Carolina Department of Employment and Workforce (SCDEW) regarding administration of WIOA and the workforce development system as a whole, consistent with the functions of the SWDB as outlined in WIOA sec. 101(d). The WIOA State Plan serves as a blueprint for the SWDB to execute its role through policy development, program alignment, and strategic investments, in support of the priorities identified and co-created by the state plan program partners. The SWDB will renew its strategic plan in calendar 2020, which will incorporate the strategies identified in the WIOA State Plan as well as board specific-strategies, such as engagement of local workforce development boards and local elected officials.

The functions of the SWDB are delegated to five standing committees:

- **The Executive Committee:** the “management” arm ensures that deliverables are in line with the Governor’s vision for workforce development.
- **The Board Governance Committee:** the “administrative” arm ensures that the Board is prepared to lead and that outputs align with the Board’s strategic plan.
- **The Collaboration and Partnership Committee:** the “convening” arm brings partners together to identify new opportunities to enhance the workforce system.
- **The SC Works Management Committee:** the “operations” arm ensures effective and consistent service delivery.
- **The Priority Populations Committee:** the committee that will strengthen the workforce development system through the development of strategies and policies that ensure priority populations are served. Populations with a highlighted focus within the committee are veterans, long-term unemployed, low-income, homeless, youth with barriers, offenders, and individuals with disabilities.

**Figure 21: State Workforce Development Board**

The SWDB convenes key stakeholders (non-board members) through ad hoc councils, work groups, or taskforces to address specific functions or priorities. To implement the priorities identified in the State Strategy, the SWDB will form new work groups and/or taskforces to address soft skills, work-based learning, and rural development, among others.

At a minimum, the board and each committee meets quarterly. Additional meetings are scheduled as needed. Workforce partners and other stakeholders are encouraged to attend SWDB meetings.

## 2. Implementation of State Strategy

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

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

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

**OBJECTIVE 1:** Identify, invest in, and support educational and developmental strategies to better prepare and expand a skilled workforce for current and emerging jobs.

**STRATEGY 1.1** Increase participation in work-based learning (WBL) activities, including Registered Apprenticeship Programs.

Work-based learning, such as on-the-job training and apprenticeship programs, offer skills-based learning experiences that benefit both trainees and businesses. Individuals can accelerate their earning potential by minimizing delay into the workforce while affording businesses the flexibility to train workers specific to their skill requirements. WBL learning activities are prevalent among partner programs but it is unknown the rate at which individuals enter WBL or whether the current rate is consistent with regional and national trends. As a starting point, we will conduct an assessment of current WBL activity, research regional and national trends and best practices, to identify opportunities for replication and improvement, and develop tools and resources that can improve the use of WBL as a workforce development activity.

**STRATEGY 1.2** Increase the formal assessment of soft skills and provision of soft skills training.

Employers have been vocal about the need for job seekers to have adequate soft skills in addition to technical skills on the job. There is a need for equal emphasis to be placed on the assessment and training of soft skills as is placed on hard skills to ensure employers have candidates that not only meet the technical skills for the field, but will retain employment through soft-skills such as effective communication, time management, and conflict resolution.

Processes or methods in assessing soft skills, as well as provision of curriculum or training to address or improve deficiencies in soft skills prior to job placement or training services, varies across programs and service providers. State-level recommendations include supporting the use of a formal soft-skill assessment and curriculum as a part of or prior to education, training, or job placement services; an inventory of local practices in the assessment of soft skills and provision of soft skills training; as well as, the identification of regional and national trends.

**STRATEGY 1.3** Increase resource investment into direct services for job seekers through results-oriented discretionary grants.

The development of discretionary grants awarded by the SWDB will be strengthened to ensure that resources are invested in direct service for job seekers. Greater emphasis on partner input in the creation and scoring of SWDB discretionary grants, as well as the development of a data-driven framework to distribute discretionary funds, are steps to support stronger outcomes. Each partner's expertise on the needs of specific populations, such as individuals with disabilities, offenders, or veterans, will support more robust and inclusive workforce development activities developed through SWDB discretionary funds.

**OBJECTIVE 2:** Align resources, policies, and strategies between state, local, and regional systems to continuously improve outcomes for businesses, partners and South Carolinians.**STRATEGY 2.1** Increase co-enrollment across partner programs.

With unemployment at record lows in SC, those that seek assistance in the SC Works centers are often facing multiple barriers to employment. "Harder to serve" populations can have enhanced employment and training outcomes through the leveraging of multiple program resources. While co-location is prevalent, co-enrollment is not as common. Developing guidance that sets the expectation of enrollment in multiple programs in order to meet the education, training and supportive service needs of individuals will be a key step in fostering an increase in co-enrollment across programs.

**STRATEGY 2.2** Develop and implement cross-partner staff training to enhance service delivery to businesses and job seekers.

SC Works Frontline Staff Training is an on-going initiative developed among partners to ensure that all staff in the centers have a strong understanding and working knowledge of the components of the public workforce system, including the purpose of the system and partner roles within the system. Extending frontline staff training by targeting efforts to specific SC Works staff positions, such as case management or business service consultants, will allow for more specialized staff development. To support effectiveness of co-enrollment (Strategy 2.1), front-line staff will be trained on best practices in serving individuals with barriers to employment. Pursuit of a shared learning management system, a software-based platform that facilitates the management, delivery and measurement of learning across partner programs, is an additional avenue for aligning and strengthening the effectiveness of the SC Works System, further supporting a system-wide approach to staff development as opposed to training siloed within agencies. Partners will review the feasibility of a shared learning management system in support of cross-partner staff training.

#### **STRATEGY 2.3 Streamline intake systems and referral processes.**

Increasing co-enrollment of job seekers across partner programs (Strategy 2.1) can be less burdensome for both the job seekers and the case managers through streamlining intake systems and referral processes. While the certification standards and SC Works System LWDA MOUs are key in outlining service provision standards to both job seekers and employers, including a common referral process to be used across partners for job seekers, there are still opportunities for improvement. State plan partners will evaluate intake and referral processes across the state to identify inefficiencies and develop policy to implement process improvements.

#### **STRATEGY 2.4 Implement strategies that increase access to reliable transportation, affordable housing and identification and vital records.**

The barriers of reliable transportation, affordable housing, and access to identification and vital records affect the ability of job seekers across partner programs to participate in employment and training activities. Both community based and public partners are collaborating as part of an advisory council to the Priority Populations Committee of the State Workforce Development Board, a committee that aims to strengthen South Carolina's workforce system through the development of strategies and policies that ensure priority populations are served. The Council is identifying ways to build the capacity of the workforce system to address these barriers, with a current focus on transportation. Objectives range from the development of a uniform planning tool across workforce programs to assist in the creation of a job seeker's transportation plan for employment and training opportunities, to enhancement of the SC virtual one-stop system through filter criteria for job opportunities near public transit stops. Continued cross-system collaboration and focus on these barriers, including the development of tools and resources to help job seekers connect to community resources, will lead to greater impact than if pursued alone or not at all.

#### **STRATEGY 2.5 Increase the number of regional, industry-led, sector partnerships**

Sector partnerships are industry-led public-private partnerships in which industry leaders are defining their collective needs, with public partners in workforce development, economic development, and education aligning to support the industry-driven agenda. All four regions of South Carolina have active sector partnerships in one of the five high-growth, high-demand sectors. To ensure continued success, growth and development of industry-led sector partnerships across SC, a long-term technical assistance plan will be created with state partners to define priorities and roles in the provision of support to regional partnerships. Additionally,

the development of tools and resources, including an up-to-date public-facing website and a resource repository for local partnerships, will serve as action steps that can further this priority.

**OBJECTIVE 3:** Identify current and future workforce needs of South Carolina business and industry to support career pathways in growth sectors.

**STRATEGY 3.1** Identify the challenges and opportunities in rural communities.

The workforce development needs of rural communities vary greatly from that of more urban, resource centered areas in South Carolina. To strategically target workforce and training efforts in rural communities and define use of discretionary funds set aside by the SWDB to support workforce development efforts in rural communities, a task force will be created to develop and provide recommendations.

**STRATEGY 3.2** Create career pathway tools and templates.

Individuals must have the resources needed to identify career paths to high-wage, high-skilled, or high-demand occupations. In support of this strategy, career pathway programs will be inventoried and analyzed to ensure job seekers have the information at their fingertips to identify specific careers and the pathways to those careers.

**OBJECTIVE 4:** Engage job seekers, employers, and other workforce partners through marketing and outreach and articulate a value proposition specific to each.

**STRATEGY 4.1** Share best practices across partner programs in order to increase awareness of partner services, promote a workforce of growth and continuous improvement, and encourage a system viewpoint.

Internal outreach is as important as external outreach to ensure workforce partners are reminded of the value and importance of their public service. Sharing best practices across partner programs serves as a locally championed form of staff development and engagement. Promoting best practices in outreach, innovative partnerships, braiding of resources and effective case management to all partners, instead of limiting acknowledgement within agencies or programs, will advance the system as a whole. In support of this priority, a method and common framework for submitting best practices will be developed. System-wide innovation awards will serve as a platform to acknowledge and incentivize best practices. In addition, partners will adopt one workforce development area at a time to methodically review innovative initiatives and programs underway, helping other areas across the state identify effective and replicable programs and learn from the success of peers.

**STRATEGY 4.2** Improve strategic outreach to employers.

The alignment of business services improves service delivery, reduces duplication of efforts, and uses limited resources more efficiently. All 12 LWDAs have active Business Services Teams (BSTs). The agencies represented on each BST vary depending on local area, but generally include SC Works system partners. Guidance will be provided to Local Workforce Development Areas on the role and composition of BSTs, as well as the development of Business Services Plans, which are required by the SC Works Center Certification Standards. Additionally, training and professional development opportunities will be made available to business services staff. Shared communication tools will be developed for business services staff to reference in sharing state and local services to support more effective employer interactions.

## B. Alignment with Activities outside the Plan

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

It is critical that partner programs beyond those covered by the plan are engaged in the implementation of these strategies early on in order to ensure alignment and to avoid duplication of activities. The following are examples of efforts that have and/or will be made in support of coordination:

**Focus Groups, Partner Feedback and Public Comment:** during development of the state plan, targeted conversations took place with key stakeholders that have either commented on the state plan in the past or are known to be working on initiatives that align with or are mentioned in the state plan. While limited in scope, those discussions helped to confirm the direction of the state strategy and shape the action steps that partners will take for strategy implementation. Additionally, the state strategy was presented to each committee of the State Workforce Development Board. Committee meetings are heavily attended by representatives of Local Workforce Development Areas providing an opportunity for them to learn about the objectives and strategies outlined in the plan. Local and regional plans will be aligned with the vision, objectives and strategies. Lastly, the plan was posted for a public comment period allowing interested stakeholders to provide feedback on the state strategy.

**Work Groups and Task forces:** Ad hoc work groups and/or task forces will be formed to work on specific priorities and action items. Work groups will provide an opportunity for other partners, including local representatives and frontline staff within the centers, to be engaged in the implementation of the state strategy. The SC Technical College System and the Office of Career and Technology Education will be key partners and called upon to serve as members on implementation work groups and task forces.

The SC Technical College System will be a critical partner for implementation of strategy 1.1, increasing participation in work-based learning opportunities. Apprenticeship Carolina (a division of the SC Technical College System) is a national leader in helping employers develop strong registered apprenticeship program. A strong partnership already exists between the SC Department of Education, Office of Adult Education, and Apprenticeship Carolina Division to develop on-ramps to registered apprenticeships targeting employment needs within each of the 12 Workforce Development Areas. This work directly aligns with the state strategy to increase participation in work-based learning activities.

A number of educational partners will be engaged in the implementation of strategy 3.2, the development of career pathway tools and templates, including the Office of Career and Technology Education, the Office of Adult Education, and the Technical College System. CTE already has plans to develop clear communication tools for students to make more informed career pathway choices.

Additionally, we anticipate both CTE and the technical college system being critical partners in the development of a long-term technical assistance strategy for sector partnerships – directly supporting priority 2.5.

CTE and the technical college system as well as four year college representatives and the Department of Commerce (economic development) are joint members of boards and councils that oversee education, workforce, and economic development activities. This level of shared governance will help to facilitate a greater level of coordination and program alignment around the priorities outlined in the state plan.

### *C. Coordination, Alignment and Provision of Services to Individuals*

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

Several strategies have been identified that will ultimately improve coordination and alignment across partners. Primarily, increasing co-enrollment and streamlining intake systems and referral processes will have the greatest impact on coordination of services for the benefit of SC Works customers.

Co-enrollment in multiple programs can improve outcomes for individuals, especially individuals with barriers to employment and those in remote areas where resources can be more limited. Disadvantaged and vulnerable populations may need supportive services, multiple service strategies, and a team approach to support success in the labor market, in which co-enrollment fosters. Developing guidance that sets the expectation of enrollment in multiple programs in order to meet the education, training and supportive service needs of individuals will be a key step in fostering an increase in co-enrollment. In an effort to increase co-enrollment of job seekers, state plan partners will evaluate intake and referral processes currently used to identify inefficiencies and best practices, and develop policy to implement process improvements. The development of a cross-partner co-enrollment policy will take place in PY 20 through efforts of the state partner workgroup.

### *D. Coordination, Alignment and Provision of Services to Employers*

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

#### *Coordination, Alignment and Provision of Services to Employers*

Coordinating outreach to employers is one of South Carolina's key strategies. In support of this strategy, South Carolina will develop a common framework for business engagement that ensures non-duplication of services. The framework will define the role and composition of local business services teams and include training and professional development for business services staff. Common outreach tools will also be created.

Sector partnerships are established in South Carolina's four planning regions and bring together workforce, economic development, and education partners. In support of sector partnerships, state plan partners will develop and implement a long-term technical assistance plan, which will include a community of practice and communication tools such as a statewide website, to expand regional, industry-led sector partnerships.

### *E. Partner Engagement with Educational Institutions*

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

South Carolina's educational institutions are vital partners in the workforce development system providing education and training programs that are aligned with employer needs and preparing individuals for family-sustaining careers.

Sector partnerships are an ideal vehicle for engaging technical colleges and career and technical education (CTE) schools. Both partners are participating in regional, industry-led sector partnerships and will be integral in the development and implementation of a long-term technical assistance plan to sustain and grow sector partnerships.

Technical colleges and CTE schools will be key participants on work groups and taskforces as the state implements efforts to increase work-based learning opportunities, soft skills assessment and training, as well as the development of career pathways.

#### ***F. Partner Engagement with Other Education and Training Providers***

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

The state's vision for workforce development cannot be accomplished without the engagement and partnership of all education and training providers. Education partners prepare South Carolina's workforce for competitive employment in in-demand industries and occupations, and their perspective is vital. Adult Education is a key partner for implementation of the state's strategies.

A strong partnership exists with adult education providers to provide GED preparation, adult basic education, high school diploma, and career readiness certification classes. With the requirement that adult education providers use Integrated Education and Training (IET), many are partnering with local technical colleges to develop career pathway programs. In 2019, the SCDE - Office of Adult Education began collaboration with the SC Technical College System's Apprenticeship Carolina™ Division to develop on ramps to registered apprenticeships targeting employment needs within each of the 12 Workforce Areas. The goal directly aligns with the state strategy to increase participation in work-based learning activities.

The Eligible Training Provider List (ETPL) is compiled to provide Workforce Innovation and Opportunity Act (WIOA) Title I participants a full array of training programs designed to meet their needs for employment or a career pathway. The South Carolina ETPL is housed on the Palmetto Academic Training hub (PATh) website. The ETPL is a comprehensive list of approved training providers and programs of training. Each training provider and program of training must be approved by at least one local workforce development area. Only approved training providers and programs listed on the ETPL are eligible to receive WIOA Title I training funds through the use of Individual Training Accounts (ITA's). WIOA emphasizes informed customer choice, job-driven training, provider performance and continuous improvement. The ETPL is utilized by WIOA participants, training providers, SC Works staff and program partners when researching career and training options.

#### ***G. Leveraging Resources to Increase Educational Access***

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

The state's vision is to expand and develop a skilled workforce. To do this, the state will focus on strengthening the workforce pipeline through work-based learning, including apprenticeship, as well as soft skills and the development of career pathways. Technical colleges and CTE schools are key partners

in these efforts and have access to additional funding and resources that will enhance access to workforce development programs.

State and federal scholarship funds are used in conjunction with program funds to increase South Carolinian's access to employment and training opportunities and supportive services. For example, students who attend a South Carolina technical college can use Lottery Tuition Assistance (LTA), SC WIN scholarships, and Pell Grants to pursue their academic goals and prepare for a self-sustaining career.

Through existing work-based learning models such as apprenticeship and Incumbent Worker Training, employers also invest in entry level training and upskilling of their workforce.

Co-enrollment strategies facilitate resource sharing across workforce development programs. One of the state's strategies for alignment and coordination is co-enrollment across core, mandatory, and optional programs, replicating the co-enrollment practice that already exists between TAA and WIOA and increasing access to education and training, case management, and supportive services.

### ***H. Improving Access to Postsecondary Credentials***

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

The State's focus on increasing the number of regional, industry-led, sector partnerships will improve access to activities leading to recognized postsecondary credentials. In sector partnerships, resources are aligned across workforce, economic development, education, and other community-based entities with the ultimate goal of preparing individuals for employment in high-demand, high-wage occupations. Sector-based education and career pathways will increase awareness of these industries and occupations and improve access to education and training leading to recognized postsecondary credentials.

The State Plan Partners' priority to increase work-based learning, includes participation in Registered Apprenticeship programs – allowing for program participants to have increased access to postsecondary credentials through earn-as-you-learn employment and training opportunities.

Additionally, partners have committed to collaborate to address common barriers that impact access to employment and training opportunities across partner programs including, reliable transportation, affordable housing and access to identification and vital records. Increasing the capacity of the workforce system, through cross-partner collaboration in the development of tools and resources that facilitate a job seekers connection to community supports, allows for jobseekers to access training services leading to post-secondary credentials.

### ***I. Coordinating with Economic Development Strategies***

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

There are several economic development entities in South Carolina, to include, but not limited to the SC Department of Commerce, readySC™, and county and regional economic alliances. Workforce development programs and activities are well coordinated with economic development entities across the State.

The SC Department of Commerce, SCDEW, the SC Technical College System, and the SC Department of Education partner at the State level to ensure that regional sector partnerships have the tools they need to thrive and grow. SC Department of Commerce Regional Workforce Advisors (RWA) and economic

alliances partner with workforce and education entities regionally to develop and implement sector strategies.

Improving strategic outreach to employers requires input from all partners, including economic development. Each LWDA has an Integrated Business Services Team (IBST) consisting of members who represent a variety of workforce and economic development entities. In nearly all of the local areas, economic development entities are represented on the BST. Business service strategies are made stronger through the collaboration of economic and workforce development in addressing employer need. For example, SCDEW Rapid Response staff partner with the SC Department of Commerce in a number of capacities, including identifying businesses in distress and/or experiencing a layoff or closure event to ensure early intervention which may avert the layoff or mitigate the impact to the business and employees.

## b. State Operating Systems and Policies

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

See III.b.1 through 9 below.

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

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

#### Adult, Dislocated Worker, and Youth Programs, TAA, and Wagner-Peyser

##### South Carolina Works Online Services (SCWOS)

The information management system for WIOA Adult, DW and Youth programs, TAA, and Wagner-Peyser is the web-based SC Works Online Services (SCWOS) system developed by Geographic Solutions, Inc. The WIOA service delivery and case management components of the system have been deployed in South Carolina since October of 2002 and have been continuously upgraded and enhanced.

The Trade Adjustment Assistance module was added in 2008 to track participants in that program. This portion of the system includes a module that tracks Trade Readjustment Allowance (TRA) payments and is updated daily. Wagner-Peyser, the state job matching system that integrates employer and job seeker data, was implemented in 2010 and has enhanced SCDEW's ability to track services across programs.

SCWOS is also aligned with Unemployment Insurance, which enables automatic registration of UI claimants into the system if accounts do not already exist. These interfaces produce files that provide information about UI claimants, including whether they are registered for work, whether they have reported for mandatory profiling workshops, and what kinds of occupations they are looking for. South Carolina requires that all UI claimants conduct at least two of their work searches through SCWOS every week. To facilitate this verification, an electronic file is provided to UI each week. Electronic files are also provided that allow UI to verify whether a claimant should be waived from the mandatory work search requirements due to participation in training. SCWOS's integration and interfaces all help support coordinated implementation of state strategies and training and employment activities.

The Customer Relationship Management (CRM) module was added to SCWOS in 2015 to manage and track employer engagement efforts. This module allows employers to be added to the system directly by designated staff while maintaining the security and integrity of the system. Additionally, spidered or unregistered employers can be converted to Marketing Leads using a mini-registration that collects only enough data for logging and tracking purposes. This mini-registration allows all employer engagement efforts to be documented regardless of registration status.

SC Works Online Services also serves as our data repository which provides State staff with full-combined PIRL and SIRS files daily. These files are then uploaded into the Workforce Integrated Performance System to comply with federal reporting requirements. Our vendor works tirelessly with us and their other clients to refine data changes made at the Federal level.

For traffic counts and services received, we have recently instituted a Greeter Kiosk which allows jobseekers and center visitors to check-in to the system for one or multiple reasons. These visit reasons are then reportable through SCWOS and roll-up to state level visit reasons.

#### **Labor Market Information (LMI)**

The Business Intelligence Department (BID) of SCDEW collects, analyzes, and disseminates various data in cooperation with the US Department of Labor's Bureau of Labor Statistics (BLS). Data includes employment statistics, job forecasts, wages, demographics, and other labor market information to help public and private organizations, researchers, and others better understand today's complex workforce. The BID helps monitor and forecast national, statewide, and local economic trends, helping employers and job seekers make more informed career, education, and economic development decisions.

BID's Labor Market Information website provides real-time, monthly, and annual information and publications. The following are a sampling of what is available on the LMI website:

**Community Profile Report:** A comprehensive report with economic, demographic, industry, occupation and education statistics for the state, counties, metropolitan, and workforce areas.

**Insights:** A monthly report from the SC Department of Employment and Workforce with employment and unemployment analyses for the state, counties, and Metropolitan Statistical Areas.

**Help Wanted Online (HWOL):** The Labor Supply versus Demand by Local Workforce Region Report is real time labor market information consisting of the number of job ads advertised on the internet and various job boards compared to the number of unemployed and a ratio of unemployed per job ad. HWOL data are indicators of labor market demand and are regularly updated. The methodology uses internet scraping and the data series is Help Wanted OnLine (HWOL) developed by The Conference Board.

#### **Online Job Bank**

SCWOS is the system used for the state's job bank and labor exchange activities. Employers can post jobs, search resumes, and find qualified staff for their operations. Job seekers can search for jobs added in the system as well as from hundreds of spidered in job boards and company websites; post resumes; and get access to a wide-variety of educational and workforce information.

#### **Adult Education and Family Literacy Programs**

The SC Department of Education (SCDE) Office of Adult Education (OAE) uses the vendor-provided web-based software application Literacy, Adult, and Community Education System (LACES). This system

provides day to day academic activity documentation, compiles and produces all reports required by the National Reporting System (NRS) and allows the state office to track performance outcomes.

The OAE has access to each local program's database as well as a combined database for state reporting. While Adult Education produces aggregate reports for a number of partners and other entities, the OAE and local providers are the only entities that have access rights to this web-based application. OAE conducts data matches with SC Dept. of Social Services, SCDEW, SC Technical College System, and with the SC Commission on Higher Education.

### Rehabilitation Act Programs

#### SC Vocational Rehabilitation Department

The Case Management System (CMS) for SCVRD is an internally developed set of programs that provide agency staff with real time access to client information to support integrated service delivery and data reporting based on the agency's unique needs. Client information is collected and reported to the Rehabilitation Services Administration (RSA) and includes the Case Service Report RSA-911, Quarterly Cumulative Caseload Report RSA-113, and Annual Vocational Rehabilitation Program/Cost Report RSA-2. Within CMS are time management tools that facilitate casework and ensure compliance to policy. These tools include automatic tasks, appointments, and compliance notifications that are recorded in the client record. CMS also provides data for customized reports available in real-time. An accuracy rate identifies trends and needed areas for improvement at the caseload, area, region, and state level. Additionally, the system allows for quality assurance to take place online locally and at the SCVRD state office.

CMS includes the Universal Business System and Career Connect components that allow the agency to support employers by preparing, identifying, and referring clients with disabilities for their hiring needs. In addition, these components assist employers receiving federal contracts to meet their hiring and reporting requirements under Section 503 of the Rehabilitation Act of 1973, as amended (Section 503), at 41 CFR Part 60-741. This enhances outreach to local business communities, provides greater detail in planning and reporting business outreach, manages the assignment of SCVRD points of contact to local businesses, and augments the SCVRD's ability to identify trends and respond effectively to employer needs.

#### SC Commission for the Blind

SCCB currently uses the AWARE (Accessible Web-Based Activity and Reporting Environment for Vocational Rehabilitation) VR Case Management System. This system collects and manages case information for all SCCB consumer services programs (Vocational Rehabilitation, Older Blind, Children's Services, Independent Living for the Blind and Prevention of Blindness). Counselors and service providers have the capability of managing cases and training services online with real-time data entry and reporting. Although the standard rehabilitation case flow process is used to organize all data pages, system parameters are adaptable to meet the SCCB business process as needed. The functionalities of AWARE include, but are not limited to, a chronological history of key events of a case, audit logging of critical data, use of multiple caseload or reporting structure search criteria, caseload reports, managed layouts, standardized letters and forms catalog, and caseload activity due reminders.

Regarding data sharing, SCCB does not currently share data from AWARE with any agency or organization; however, data sharing with SCDEW is currently pending. The purposes of data sharing will be to obtain wage data for social security reimbursement and the WIOA primary performance indicators.

### Temporary Assistance for Needy Families

The Department of Social Services utilizes the Participation and Tracking System (PATS) to monitor TANF work program participation and time-limit requirements. PATS provides electronic documentation of the TANF participant's engagement in activities designed to further self-sufficiency. Case management efforts to assist a TANF benefit group and the associated tracking of these efforts are also maintained in PATS.

Workforce Consultants who are responsible for assisting TANF recipients with obtaining employment opportunities utilize the SC Works Online Services (SCWOS) system, operated by the Department of Employment and Workforce. These co-located Workforce Consultants have partner access which allows for referrals to listed vacancies, enrolling of employers, and job seeker services.

### SNAP Employment and Training

In 2019, the Department of Social Services' SNAP Employment & Training (SNAP E&T) program created a secure portal for E&T training providers to obtain eligibility information, a streamlined process for inputting all of the contractual information related to each provider, a modernized tracking system for all participation information, a queue for E&T staff to manage their workload, and the framework for future enhancements to include invoicing, data collection, and ad hoc reporting. This system, the South Carolina Comprehensive Employment and Training System (SCCETS), allows real-time access to client information for both case management staff as well as providers while also maintaining the required data for the SNAP E&T national reporting measures.

SNAP E&T Coordinators, who are co-located in SC Works Centers, utilize the SC Works Online Services (SCWOS) system, operated by the Department of Employment and Workforce. Their partner access allows these SNAP E&T Coordinators to assist job seekers and employers.

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

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Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.<sup>10</sup>

[10] For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

#### **Adult, Dislocated Worker, and Youth Programs, TAA, And Wagner-Peyser**

The SC Works Online Services (SCWOS) System integrates the required performance measures and has the capability to generate on-demand reports. Until final reporting guidance is issued, the State and its vendor are working closely to ensure any changes to the Participant Individual Record Layout (PIRL), the file format for data submission to DOL, are reviewed on monthly State User Group calls between the vendor and the State.

System generated reports, as well as our state developed ad hoc reports, are used to evaluate the efficiency, performance, and effectiveness of the workforce system. Reports also help staff identify data issues within the system so that data may be corrected in a timely fashion. Examples of available reports include caseload, Adult priority of service, and aggregate reports that advise on comprehensive oversight matters such as participants receiving training, participation levels, and Youth five percent limitation/exception in each of the LWDAs and SC Works Centers

The state follows Federal performance and reporting processes. South Carolina has made quarterly and annual submissions through the Workforce Integrated Performance System (WIPS) since it became available in October 2016. While data specific to LWDAs within our state is presently unavailable from

the Department of Labor, the state is collaborating with the Department to ensure state data submissions are received and certified.

Additionally, the state requests wage records each quarter from the Unemployment Insurance Division of the South Carolina Department of Employment and Workforce. The state has data sharing agreements with State Wage Interchange System (SWIS), and South Carolina began using this system in January 2020.

### Adult Education and Family Literacy Programs

Local providers eligible for adult education use a state standardized registration/intake form to collect student information upon entry into the local program. All data entry occurs at the local provider level. Instructional hours are added on a monthly basis to document student attendance. Goals and Cohorts are entered and marked "met" as required by federal guidance. OAE has access to all local program information through LACES, and each local program has the capability to run the federally required reports on only their program. At the state level, Adult Education can run these reports on all eligible providers.

### Rehabilitation Act Programs

#### SC Vocational Rehabilitation Department

The Case Management System (CMS) for SCVRD is an internally developed set of programs that allows for the flexibility of interfacing with partners as necessary. For example, SCVRD's system works with the South Carolina Enterprise Information System (SCEIS) to process client procurements, the South Carolina Department of Health and Human Services (SCDHHS) for Social Security verification and beneficiary status through the State Verification and Exchange System (SVES), and the South Carolina Workers' Compensation Commission. An exchange of data from SCDEW is now in place for wage data necessary for reporting on WIOA performance measures: employment 2<sup>nd</sup> quarter after exit, employment 4<sup>th</sup> quarter after exit, and median earnings 2<sup>nd</sup> quarter after exit. CMS also allows the agency to make changes and improvements quickly, deliver consistent services to clients statewide, react to data changes enacted by RSA as mandated, and provide real-time reporting.

SCVRD faces the following challenges with regard to implementing WIOA performance measures:

- identifying and collecting data which has not been required in the past;
- adequacy of resources to work on WIOA-mandated data collection and reporting requirements;
- identifying and accessing data for post-exit measures related to education, training, and credential attainment; and
- identifying and accessing data that is not available from UI wages, such as self-employment, federal/military, and out of state wage data.

#### SC Commission for the Blind

SCCB's data collection process consists of data that is collected directly from consumers, medical health providers (eye and medical doctors), educational institutions, consumer organizations and advocacy groups, and the Social Security Administration. Although Counselors in all consumer services programs have the primary responsibility of collecting and entering data, other staff, such as Counselor Assistants, Supervisors, and service providers can also collect and enter consumer data as needed.

### Temporary Assistance for Needy Families

The Participation and Tracking System (PATS) has existing reporting capabilities to calculate the state's TANF participation. These routine, system-generated reports are reviewed at the state, county, and individual level to monitor the provision of effective case management services for TANF work program participants. Whenever necessary, ad hoc reports can be generated to retrieve TANF data associated with special initiatives or pilots.

### SNAP Employment and Training

The South Carolina Comprehensive Employment and Training System (SCCETS), allows real-time access to client information for both case management staff as well as providers while also maintaining the required data for the SNAP E&T national reporting measures. The SNAP E&T program submits an annual report which measures the impact of E&T components. In addition to its security as a centralized data repository for SNAP E&T, SCCETS was internally developed to collect the data required for the annual performance report. SCCETS interfaces with the Department of Social Services' TANF and SNAP eligibility system, Client History and Information Profile (CHIP), to allow providers to securely and remotely determine if a participant is eligible to participate in the SNAP E&T program.

## 2. The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system

### *SC Works Center Certification*

As required by WIOA, the State has established SC Works Certification Standards to evaluate local SC Works centers and the SC Works delivery system for effectiveness, including customer satisfaction, physical and programmatic accessibility, and continuous improvement. The Standards are divided into Management, Job Seeker, and Business Services standards and include baseline measures and proposed methods of evaluation for each standard. Local workforce development boards submit Business Engagement and SC Works Operational plans, documentation of the SC Works certification standards assessment process, and documentation of a full certification determination to the state every three years. Centers were last certified in June 2019. Included within the standards is the expectation that all SC Works partners complete the SC Works 101 training, directly supporting strategy 2.2, the development and implementation of cross-partner staff training.

### *Rapid Response Manual*

The U.S. Department of Labor (DOL) and our state and local workforce investment system partners offer many services to help businesses and workers deal with the effects of layoffs and plant closures, including those that result from increased competition from imports, natural disasters, and other events. One such service is Rapid Response. Rapid Response is a pro-active, business-focused, and flexible strategy designed to respond to layoffs and plant closings by quickly coordinating services and providing immediate aid to companies and their affected workers. Rapid Reemployment teams work with employers and any employee representative(s) to quickly maximize resources to minimize disruptions associated with job loss.

The Rapid Response Manual was developed and issued in 2019 to establish a comprehensive resource for Rapid Response information and operational guidance, and communicate expectations for delivery of Rapid Response services statewide across multiple programs. Rapid Response teams are comprised of representatives from the following programs:

- WIOA Title I – Dislocated Worker
- Wagner-Peyser
- Unemployment Insurance
- TAA

The manual was distributed through a memo to all SC Works staff, including partners, to ensure high-quality, consistent, and timely services to businesses, supporting strategies 2.2 and 4.2, cross-partner staff training and business outreach, respectively. Multiple training sessions regarding Rapid Response services and the manual were conducted and all staff providing Rapid Response services are required to complete the training and study the manual prior to attending any onsite Rapid Response event.

### ***Sanctions Policy***

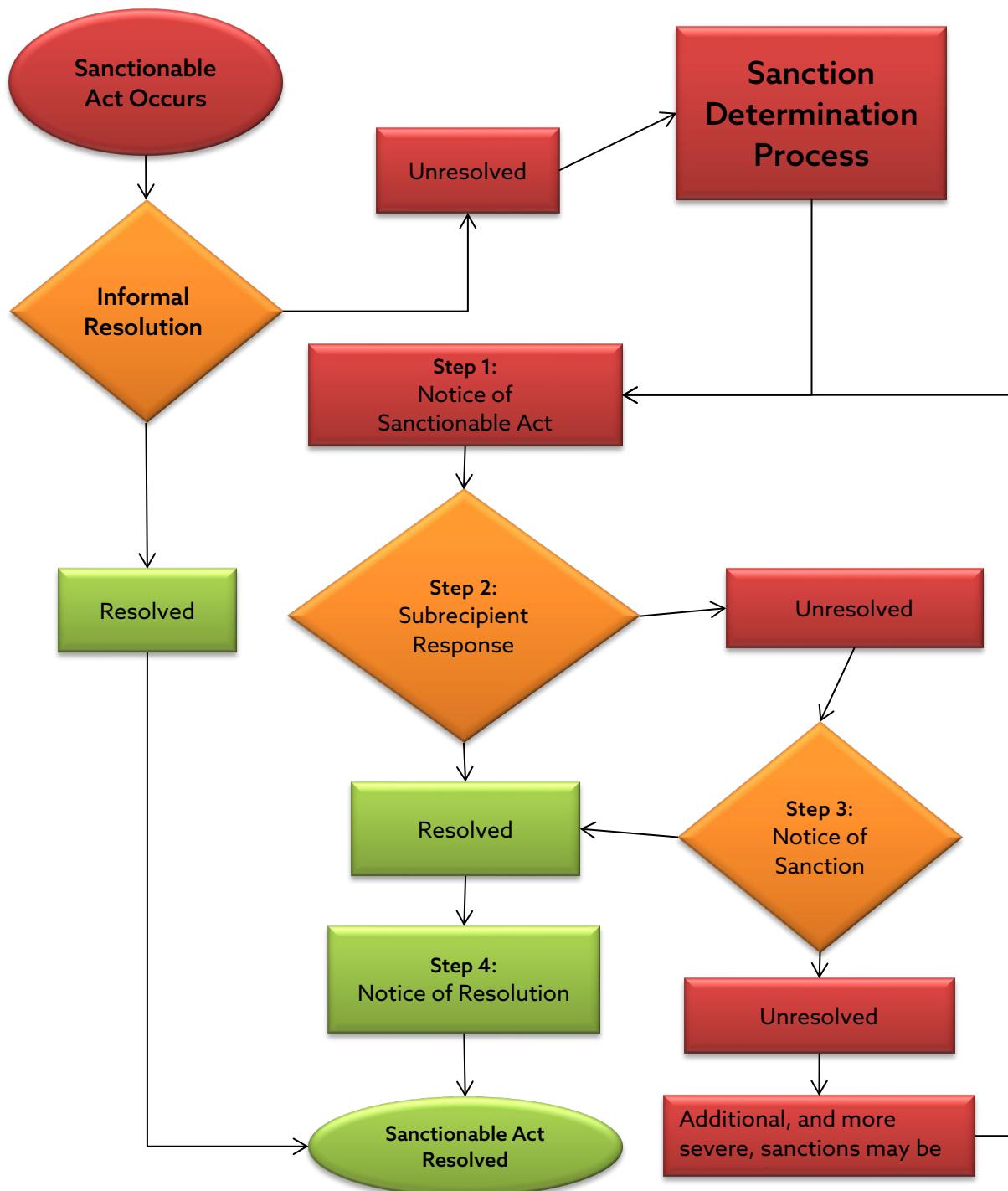
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The U.S. Department of Labor (DOL), as the federal oversight agency for WIOA and the national workforce system, ensures that the requirements of WIOA are met and has the authority to impose sanctions on states for failure to perform and operate in compliance with the programs. The Department of Employment and Workforce (SCDEW), as the Governor's designated administrative entity, in conjunction with the State Workforce Development Board (SWDB), has the responsibility of ensuring accountability of subrecipients, including compliance with applicable federal and state laws, regulations, policies, guidance.

At the request of the SWDB, a policy was developed that outlines a process for identifying, assisting with, and addressing potentially sanctionable acts, including a LWDB's failure to meet the established federal and state standards of performance and compliance with federal, state, and local laws, regulations, policies, and guidance.

After a vigorous development and approval process, which included a public comment period, the policy was unanimously approved by the SWDB in December of 2019 and became effective immediately. The policy will assist the SWDB with increasing accountability and ensuring improved performance in achieving outcomes, ensuring adequate returns on SC's workforce investments, and supporting the state in achieving its workforce goals.

Figure 22: Flowchart of sanction determination process



**Note:** Timelines for completion of each step are to be determined based on the type of sanctionable act and appropriate times necessary for resolution of the sanctionable act.

## *Guidelines for Resource Sharing and Infrastructure Funding*

A work group of state partners was established to discuss and better understand the complexities of resource sharing and infrastructure funding of the one-stop delivery system. Guidance was developed, and reviewed by the work group, that will assist local boards in determining equitable and stable methods of funding infrastructure. The guidance advises local workforce boards that infrastructure and shared services costs should be allocated proportionately among partners, unless not permitted due to partners' funding restrictions. Determining the proportionate share attributable to a specific partner program is part of the negotiation process. Partners should first review SC Works Center budgets to determine which costs should be shared. The USDOL-issued One-Stop Comprehensive Financial Management Technical Assistance Guide is referenced as a resource for federally accepted cost-sharing methodologies. Local boards and partners are expected to negotiate in good faith. Costs must be allowable, allocable, and reasonable. Partners may pay for their share of the system through cash payments or fairly evaluated in-kind contributions. The proportionate share methodology and payment mechanisms developed, negotiated, and approved by each partner must be included in the Infrastructure Funding Agreement (IFA) as part of the Memorandum of Understanding (MOU) to ensure costs are allocated to partners in proportion to benefit received.

A MOU template, which includes the IFA and related documents, was developed in collaboration with core and other partners at the State level using the two preferred and currently used cost allocation methodologies in SC, Full-time Equivalency and Square Footage. The template is designed to give guidance in the development of local area service delivery agreements and to ensure that Local Boards and partners are in compliance with US Department of Labor directives, as well as those of the partners' federal cognizant agencies. Local Boards and partners must utilize the template of their choosing and all attachments when negotiating the MOU to increase consistency among all partners and maximize partner participation in the development and execution of the agreements. Additionally, the template and attachments must be used as formatted to streamline the signature process, including ease of administration for partners with multiple agreements to review.

To ensure compliance and fiduciary responsibility, all MOUs for the upcoming program year must be fully executed no later than June 30<sup>th</sup> of each year. Local Boards must ensure all required partners are engaged in a timely manner to allow for the necessary negotiations. To facilitate state partner engagement and participation in the local negotiation process, specific meeting dates are determined and issued to the Local Boards annually by the State. Additionally, Local Boards must report the outcome of negotiations to the State annually by April 15<sup>th</sup> in accordance with state policy.

In addition to the guidance already created, we anticipate the development of technical assistance in the form of policies, memos, and manuals to aid in the implementation of the state strategies. Plans to develop supporting policies include the following:

- Increasing work-based learning activities, **strategy 1.1**, will be supported by the development of a SC specific toolkit that creates awareness across partners of work experience program similarities and differences for use by front-line to better serve both employers and job seekers.
- **Strategy 1.2**, involving soft-skills, will be adopted by a task force appointed by the SWDB in the first quarter of PY 20. Recommendations of the taskforce will be reviewed by state partners for potential adoption into state level guidance.
- A co-enrollment policy will support the increase of co-enrollment across partner programs, (**strategy 2.1**) setting the expectations of enrollment in multiple programs. The development of this policy will take place in PY 20 through a state partner workgroup.

- Sector partnerships, seen in **strategy 2.5**, will be supported through a revamping of a centralized landing page for stakeholders to view already developed resources, such as the SC Sector Partnership Toolkit, and other technical assistance materials to guide regional teams. This will be supported through the development, by the sector partnership state leadership team, of a long-term technical assistance plan to sustain and grow sector partnerships in PY 20.
- The strategy focused on career pathways (**3.2**) includes the development of tools and templates as integral to the priority. The Office of Career and Technical Education (OCTE) has begun the process of developing online and print resources that identify career pathways for the benefit of students, parents, and increased community awareness, of which the issuance of state level communication in the form of memos or guidance will ensure awareness of the resources.
- **Strategy 4.2**, improving strategic outreach to employers will be made possible through the creation of common communication tools for business service representatives to use in sharing state and local services available to businesses, developed through a state-partner workgroup in PY 21.

### 3. State Program and State Board Overview

#### A. State Agency Organization

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

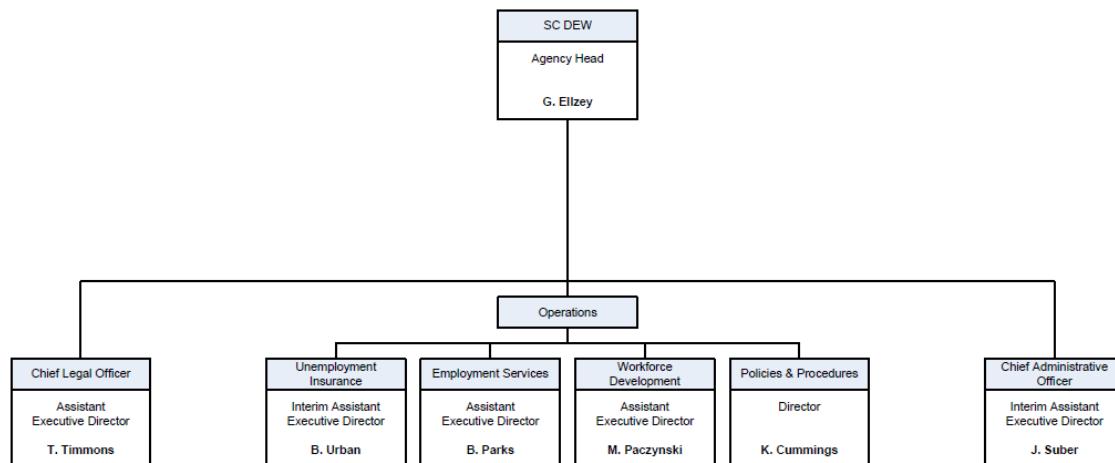
##### **South Carolina Department of Employment and Workforce (SCDEW)**

SCDEW is a cabinet agency and is the state administrative entity for Title I Adult, Dislocated Worker, and Youth programs, Title III Wagner-Peyser Program, Trade Adjustment Assistance Program, and Jobs for Veterans State Grant program. The Executive Director and members of the SWDB are appointed by the Governor. The SWDB assists the Governor and executes his/her vision for the state's workforce development system by setting policy and providing strategic direction.

SCDEW has four key divisions: Unemployment Insurance, Employment Services, Workforce Development, and Labor Market Information. Through these divisions, the agency is responsible for paying unemployment insurance benefits, collecting unemployment taxes, helping people find jobs, matching businesses with qualified candidates, and collecting and disseminating state/federal employment statistics.

The majority of SCDEW's budget is funded through federal sources. The US Department of Labor allocates funds from the Federal Unemployment Tax (FUTA) to the states to pay for administrative and operational costs. Employer-paid state unemployment taxes pay for state unemployment benefits.

Local administration of the WIOA Title I program is delegated to 12 Local Workforce Development Areas (LWDA). Each LWDA also has at least one comprehensive SC Works Center where individuals and businesses can access Title I, Title III, TAA, Veterans, TANF, and SNAP program services, as well as a variety of other partner programs and services. Some LWDAs also have satellite centers and access points making programs and services more readily accessible. SCDEW provides oversight through compliance monitoring and technical assistance to ensure compliance and enhance the delivery of services.

**Figure 23: South Carolina Department of Employment and Workforce Organizational Chart****SC Department of Employment and Workforce****Figure 24: South Carolina Local Workforce Development Areas**

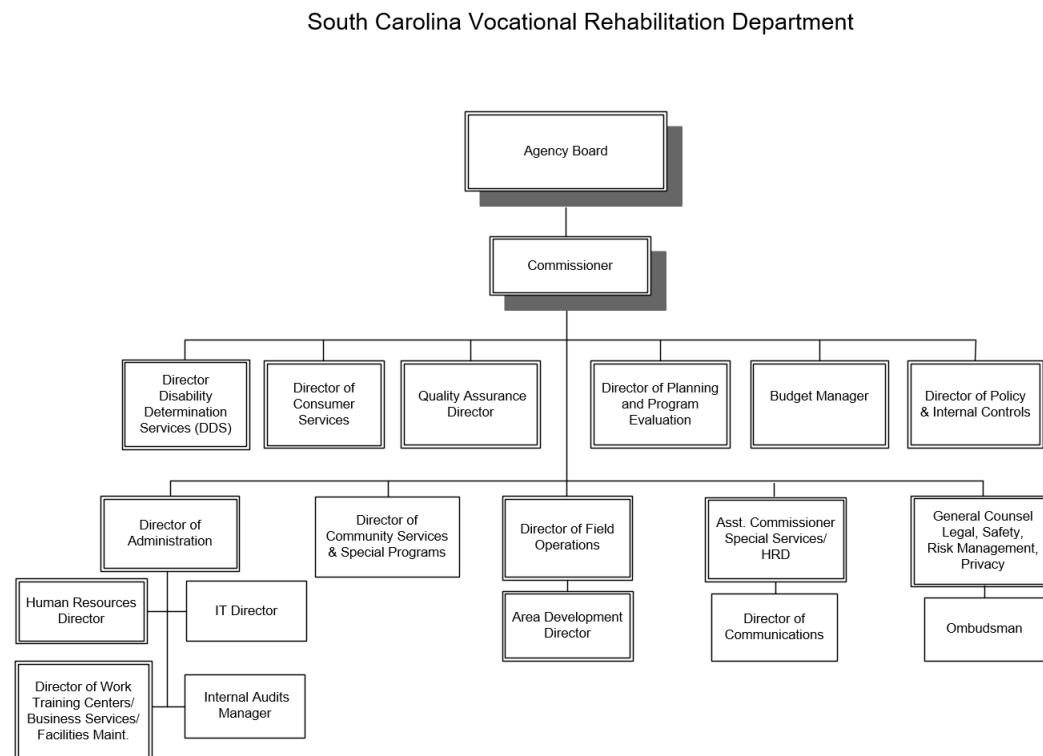
### South Carolina Vocational Rehabilitation Department (SCVRD)

The SCVRD board sets policy under which the Vocational Rehabilitation Department operates. Board members are appointed by the Governor and confirmed by the Senate, serving seven-year terms.

The agency operates in 24 area offices and 24 work training centers across the state, through which services are provided to all eligible individuals who desire to enter or maintain competitive, integrated employment. Through a team approach, SCVRD counselors, assessment and career exploration specialists, job readiness training staff, job preparedness instructors, and business development specialists work to prepare clients for employment opportunities within their local labor market, as well as develop relationships with business and industry to match clients individually with employment opportunities that fit their strengths, abilities, capabilities, and skill sets. Comprehensive programs, including occupational therapy and physical therapy services, rehabilitation engineering, IT training centers, as well as residential alcohol and drug recovery treatment facilities further expand the capacity of SCVRD to meet the needs of eligible individuals with disabilities.

The SCVRD State Office consists of the following Departments: Administration; Business Services; Communications; Community Services and Special Programs; Consumer Services; Facility Maintenance (Buildings and Grounds); Field Operations; Finance Operations; Grants and Funds Management; Budget; Human Resources; Human Resource Development; Internal Audits; Information Technology; Job Readiness Training Center Services; Legal, Safety, Risk Management and Privacy; Policy and Internal Controls; Planning and Program Evaluation; Quality Assurance; and Procurement.

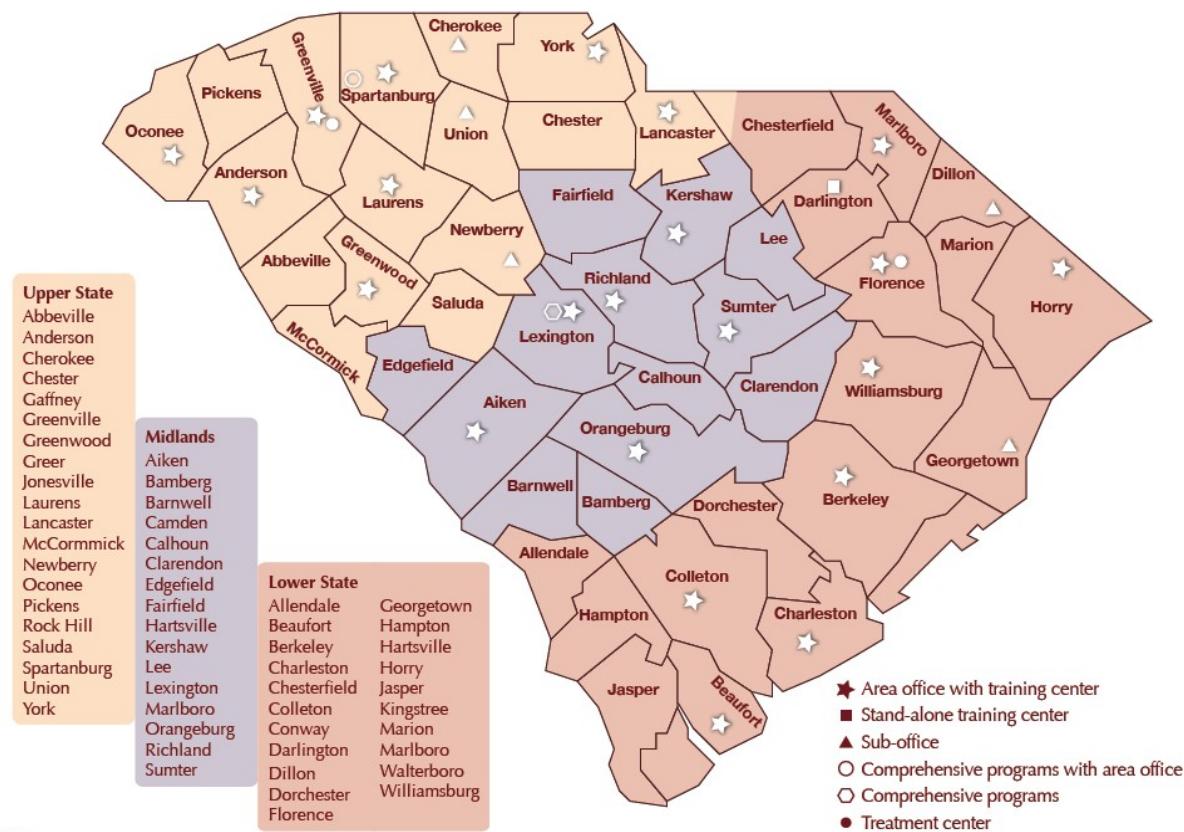
**Figure 25: South Carolina Vocational Rehabilitation Department Organizational Chart**



Rev. 03-05-2020

**Figure 26: SCVRD Regions**

# SCVRD Regions

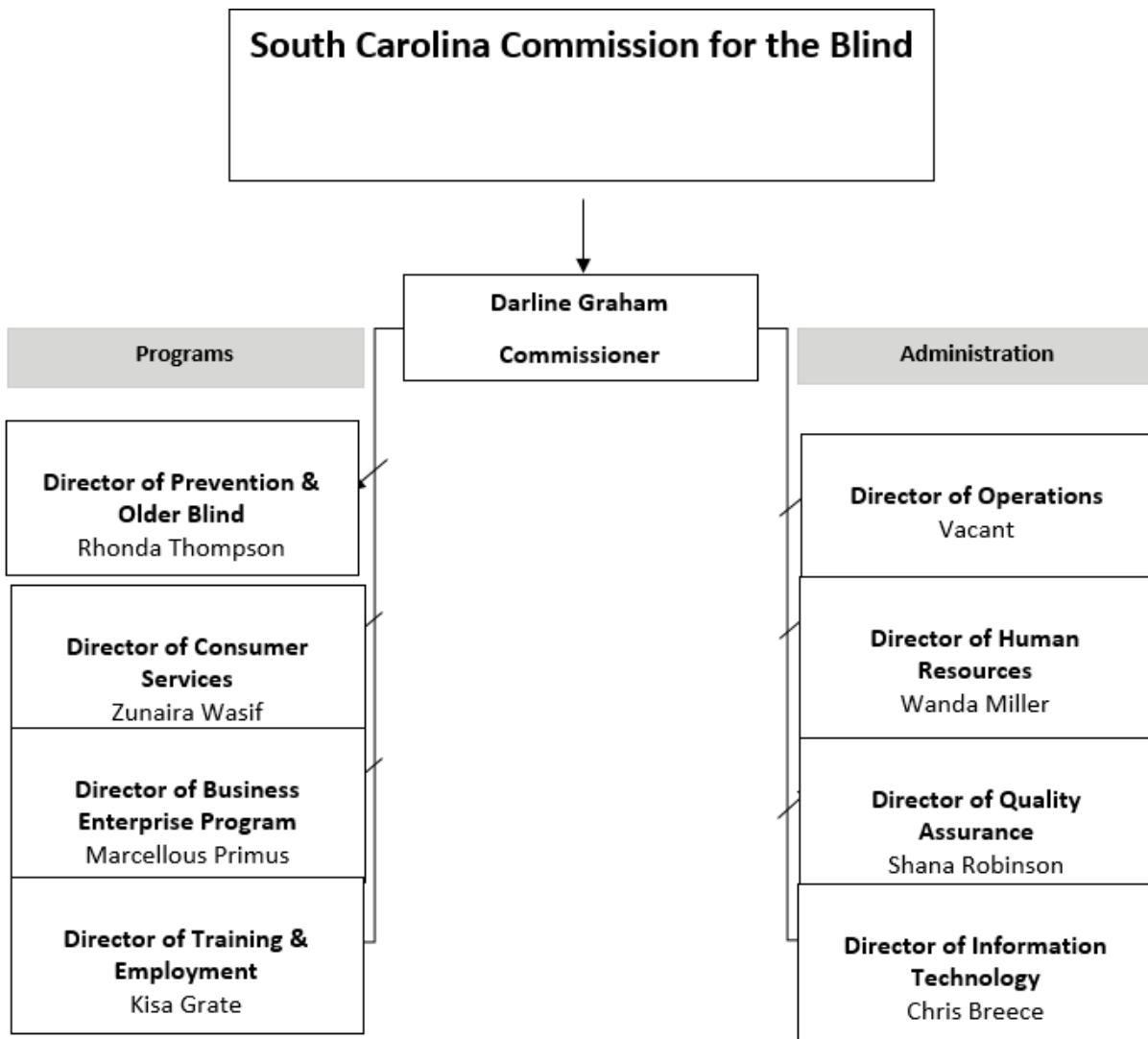


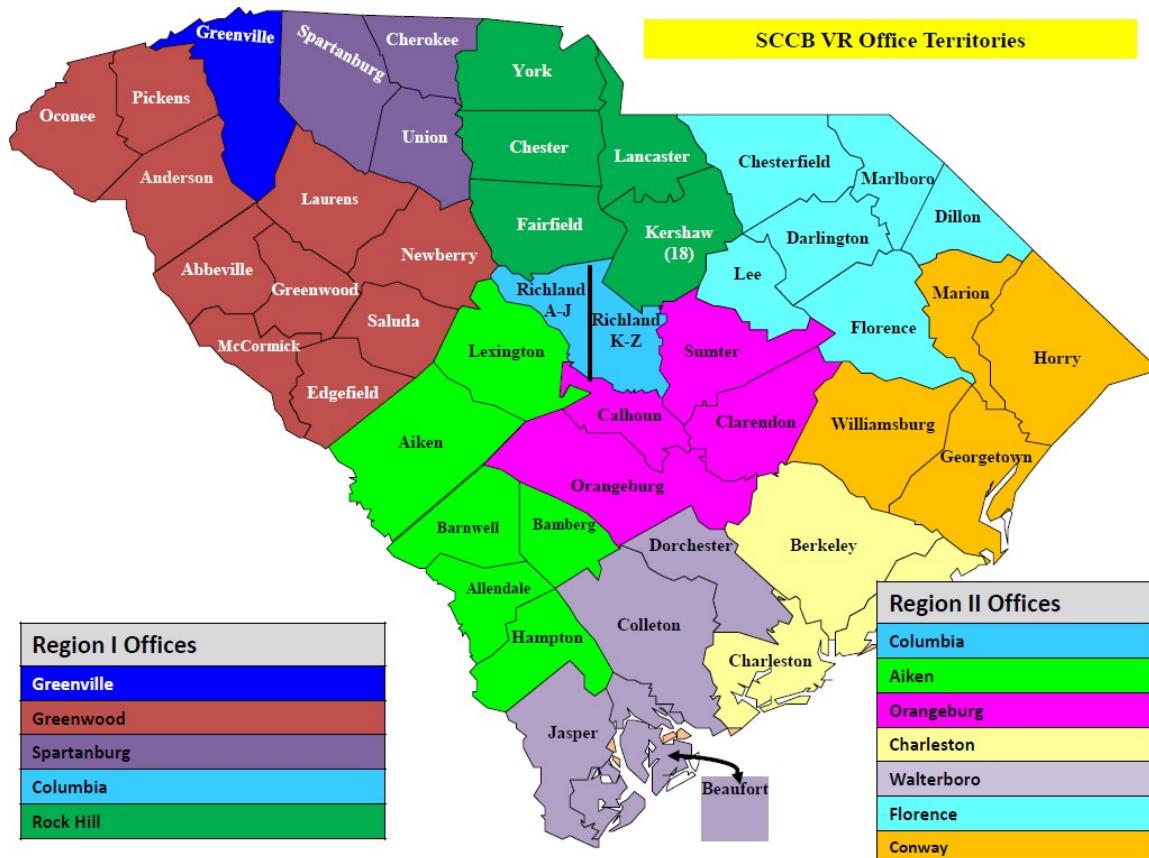
South Carolina Commission for the Blind (SCCB)

The SCCB Board of Directors works with the Senior Management Team to set policy, establish goals and strategic plans, and ensure the quality provision of vocational rehabilitation services to blind consumers. Board members are appointed by the Governor and confirmed by the Senate, serving four-year terms.

The Commission operates nine local area offices through which services are provided to all eligible individuals who desire to enter or maintain competitive integrated employment. The Ellen Beach Mack Rehabilitation Center in Columbia provides comprehensive adjustment to blindness services including personal adjustment to blindness, orientation and mobility skills, daily living skills, Braille literacy skills, and pre-vocational training on the use of Assistive Technology devices. SCCB counselors, Adjustment to Blindness Instructors, Vocational Evaluators, and Employment Consultants work to prepare consumers for employment opportunities within their local labor market. Employment Consultants build relationships with business in order to provide talent acquisition and talent retention services. In addition, the Commission manages a state-funded Blindness Prevention Program, Independent Living Program, the Older-Blind Program, Low Vision Clinics, and the Business Enterprise Program.

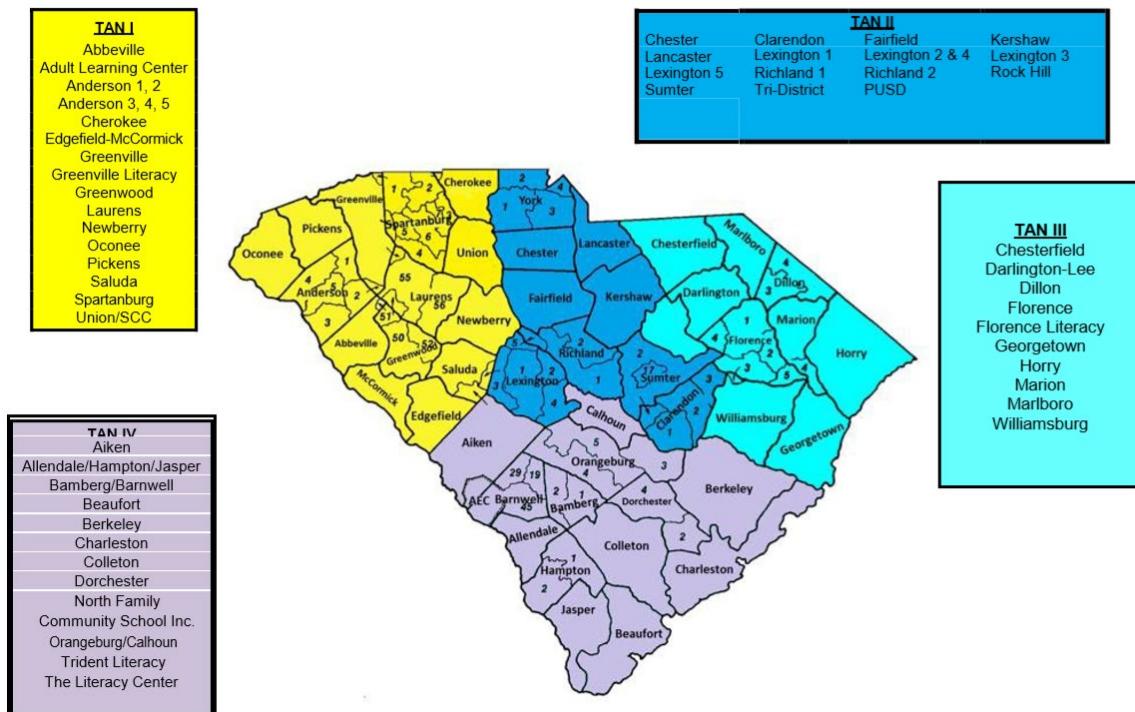
Figure 27: South Carolina Commission for the Blind Board Organizational Chart



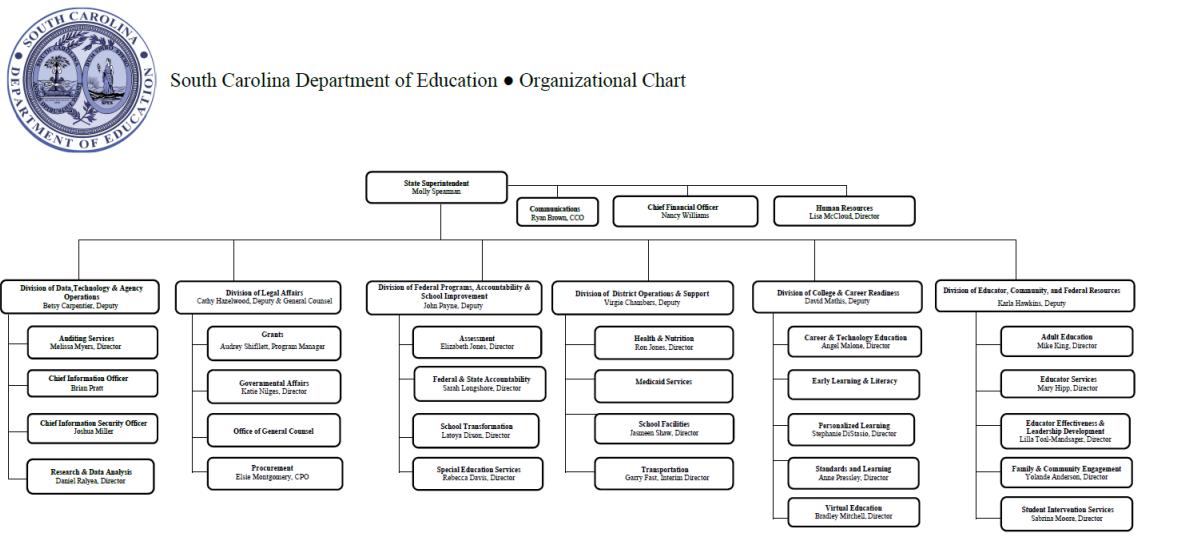
**Figure 28: SCCB Vocational Rehabilitation Office Territories**

### SC Department Of Education, Office of Adult Education

The South Carolina State Board of Education oversees the South Carolina Department of Education (SCDE). The SCDE is responsible for K-12 public education and is under the supervision of the elected State Superintendent of Education. The Office of Adult Education is contained within the SCDE under the Division of Federal, State, and Community Resources, and is managed by the position of State Director of Adult Education. Technical support and compliance monitoring are provided by Education Associates within the Office of Adult Education. There are 79 school districts in South Carolina that are required by state legislation to provide Adult Education services.

**Figure 29: Adult Education Technical Assistance Networks****Adult Education Technical Assistance Network (TAN)**

Adult education programs are voluntary and afford opportunities for students to obtain a high school equivalency diploma (HSED), a high school diploma (HSD), a career readiness certificate, participate in English as a second language classes (ESL), and family literacy (FL). Some adults enroll to improve their basic literacy and/or numeracy skills. Adult education classes are taught by certified teachers and trained volunteers who are overseen by certified teachers. Each adult education program has a program director, instructors, administrative support, a designated data specialist, a college and career navigator, and key staff to support initiatives offered by the program.

**Figure 30: South Carolina Department of Education Organizational Chart**

### SC Department Of Social Services

The Department of Social Services (DSS) is a cabinet agency with the State Director appointed by the Governor of South Carolina with the advice and consent of the Senate. The Department has offices in each county and regional offices for adoptions, intensive foster care and clinical services, and child support enforcement.

The Department's mission is to serve South Carolina by promoting the safety, permanency, and well-being of children and vulnerable adults, helping individuals achieve stability and strengthening families.

DSS provides protective services for children and vulnerable adults, adoption, and foster care services. It administers federal Title IV-B Child Welfare Services and Title IV-E Foster Care and Adoption Assistance program. Additionally, the Department is the administrator of the Interstate Compact on the Placement of Children. The Department also establishes standards for and licenses child care providers and residential group homes for children.

Through its Division of Economic Services, DSS administers economic assistance programs including the federal Temporary Assistance for Needy Families (TANF) program, which provides employment and training for people receiving cash assistance. The Department administers food assistance programs in every county in South Carolina. The Supplemental Nutrition Assistance Program (SNAP) is a federal benefit to assist low income individuals in purchasing food. Also, a commodities program distributes supplemental food through a network of food banks. Other food programs provide financial assistance for child and adult care providers, homeless shelters and summer feeding sites for children. The Department also administers the child support enforcement program under federal Title IV-D and other child support services, including fatherhood initiatives.

Under the Economic Services umbrella, the Division of Employment Services offers programs and services to individuals who often have the most significant barriers to employment. These programs include:

- The Temporary Assistance for Needy Families (TANF) program provides transportation, child care assistance, job training, employment activities, and other support services while



simultaneously receiving case management and cash assistance. Using a holistic approach, case managers work to promote self-sufficiency for the benefit of the entire family.

- The Supplemental Nutrition Assistance Program Employment and Training Program provides support services to SNAP recipients in an effort to increase their long-term employability. Support services include childcare, transportation, job retention services, and rent assistance, among others.
- Project HOPE provides education and training to low-income individuals for occupations in healthcare that pay well. Project HOPE is a Health Profession Opportunity Grant (HPOG) funded by the U.S. Department of Health and Human Services' (DHHS) Administration for Children and Families (ACF). The target populations for Project HOPE include TANF and SNAP recipients, low-income individuals, youth aging out of foster care, and veterans.

**Figure 31: SC Department of Social Services Organizational Chart**

## B. State Board

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Provide a description of the State Board, including—

See III.b.3.B.i. and ii.

### i. MEMBERSHIP ROSTER

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

South Carolina's State Workforce Development Board consists of members who are representatives of the health care, manufacturing, business and information management, transportation and logistics, and construction industries. The SWDB also includes leadership from the core programs, chief elected officials, and State Legislators, other state agencies, and community-based organizations.

#### Governor:

Honorable Henry McMaster

#### Members of Each Chamber of the State Legislature:

Senator: Senator Ross Turner

Representative: Representative Mike Forrester

#### Representatives of Business:

Chairman, Donald Tomlin

Prisma Health, Valerie Richardson

Pee Dee Food and MEM, Nick P. Foong

ASSA ABLOY Entrance Systems, Thomas Freeland

Find Great People, John Uprichard

OCS Garage Doors and Hurricane Services, James Holloway

U-Save Auto Rental, Archie Maddox

Piedmont Bushings and Insulators, LLC, Michael Sexton

Schaeffler, Gregory Tinnell

Cooper Standard, James Snead

Southeastern Freight, Clifford Bourke

Clemson University, Dr. Windsor Sherrill

#### Representatives of Labor Organizations, Apprenticeship Programs and Community Based Organizations:

International Longshoremen Association, Charles Brave

SC Painters and Allied Trades, JAC, Local 1756, Edward Sturcken

#### Community Based Organizations:

Goodwill Industries of the Upstate/Midlands, Pat Michaels

Gleams, HRC, Inc., Dr. Joseph Patton

Transitions, Colonel Craig Currey

**Core Partners:**

Department of Employment and Workforce, Dan Ellzey (Adult, DW, and Youth and Wagner-Peyser)

Department of Education, Mike King (Adult Education)

Vocational Rehabilitation, Felicia Johnson (Vocational Rehabilitation)

**Chief Elected Officials:**

Vacant

**Additional Workforce Partners:**

SC Technical College System, Dr. Tim Hardee

Central Carolina Technical College, Dr. Gregory M. Mikota

**Standing Committees**

The Board executes its functions through four standing committees:

The **Board Governance Committee's** purpose is to prepare, assist, and equip the State Workforce Development Board (SWDB) to be the leading advocate for innovative, coordinated workforce development in South Carolina. Its functions include:

- equipping SWDB members with resources and tools to be leaders and drivers of workforce development;
- providing opportunities for SWDB members to be engaged with workforce efforts and support SWDB initiatives;
- supporting SWDB direction and decisions with data and systematic processes;
- developing members to be effective advocates on a local, state, and national level;
- developing and monitoring board-related policies;
- establishing and internally communicating the board's position on governance issues;
- evaluating the workforce development system on a continual basis; and
- gathering and presenting data for the establishment of best practices and continuous quality improvement.

The **SC Works Management Committee's** purpose is to build a demand-driven workforce delivery system that equips job seekers with the skills businesses need. Its functions include:

- championing initiatives to make in-person and online services and access to services more user-friendly;
- overseeing the implementation of the SC Works Certification process by the local areas, and monitoring and maintaining the progression of the standards;
- Developing benchmarks and baseline standards to measure and evaluate SC Works system performance;
- identifying training needs (hard, middle, and soft skills) and opportunities for businesses and job seekers and implementing and/or driving efforts to close gaps;
- initiating statewide operational practices to improve service delivery;

- improving communication with local workforce development boards; and
- promoting business engagement with the workforce system.

The **Collaboration and Partnership Committee's** purpose is to increase collaboration among workforce, economic development, and educational allies, in partnership with business and industry. Its functions include:

- sustaining the alignment and partnerships among workforce development, economic development, education, and community-based organizations;
- improving state-level partnerships through the development of a cross-agency workforce development strategic plan, regular meetings, and MOU(s) to facilitate local-level collaboration;
- promoting the integration of state-level data systems, identifying resources and strategies that remove duplicate efforts and costs; and
- advocating for the implementation of regional strategies that align public resources around targeted industry sectors.

The **Priority Population Committee's** purpose is to strengthen South Carolina's workforce system through the development of strategies and policies that ensure priority populations are served. Its functions include:

- promoting outreach efforts to all WIOA priority populations with a focus on youth with barriers, ex-offenders, veterans, individuals with disabilities, homeless, and long-term unemployed;
- working with the Priority Populations Coordinator to establish a written strategic plan and subsequent policies to support WIOA Youth program services;
- developing benchmarks and baseline standards to measure and evaluate the effectiveness of programs and services for individuals with barriers to employment;
- initiating statewide operational practices to improve service delivery to priority populations; and
- improving communication with appropriate agencies, non-profits, the faith community, and other community-based organizations that already serve priority groups.

Key state and local stakeholders are routinely invited to participate in ad hoc work groups and taskforces and to attend or present at committee and full board meetings, lending their expertise and feedback to policy development and workforce strategies.

### Term Limits

Members of the SWDB serve for a term of years as provided below. Term of service is defined as beginning at the time of appointment and ending upon resignation or removal from the board.

Three-year term with the option for reappointment for one consecutive three-year term:

- State Legislators and Chief Elected Officials
- "Other" Representatives as the Governor may designate

Four-year term with the option for reappointment for one consecutive four-year term:

- Representatives of Business
- Representatives of Labor

- Representatives of Community-Based Organizations

Board members may be reappointed for a third term after a break in service. A break in service is defined as at least 12 consecutive calendar months since resignation. Persons removed from the board are not eligible for reappointment.

The Board Chair serves for a period of time as requested by the Governor after which time he/she may be appointed to the Board as a member according to the term limits provided above.

## **ii. Board Activities**

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

### **Training and Professional Development**

As members are appointed to the SWDB, they receive an orientation that includes: the role, organization, and functions of the SWDB; the organization and funding of the workforce system; relevant Federal and state laws and policy guidance, and current SWDB initiatives.

After initial appointment, staff and system partners continue educating new and returning members on issues related to the workforce through committee participation and board meetings. SWDB members are also encouraged to participate in relevant professional development conferences, trainings, and events.

### **Quarterly Meetings**

At a minimum, the board and each committee meets quarterly face-to-face or remotely (via webinar/conference call capabilities). Additional meetings are scheduled as needed. Workforce partners and other stakeholders routinely attend meetings. One-on-one planning and information sessions are conducted for committee members to be educated on relevant issues and informed of their role with regard to specific workforce initiatives.

### **Strategic Planning**

In September 2017, the SWDB completed a 3-year strategic plan, "Strategies to Build a Competitive Workforce". The strategic plan is the blueprint for the SWDB to build policies, align programs, and invest in workforce development. Each committee has an action plan that aligns the committee purpose and specific functions to the execution of the strategic plan.

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

### **A. Assessment of Core Programs**

---

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

#### **WIOA Primary Indicators of Performance**

The WIOA Primary Indicators of Performance and state-identified performance measures are used to assess program quality and effectiveness. Monitoring and technical assistance, including training, are used as overall compliance and continuous improvement tools.

#### **Annual and Interim Reporting On The WIOA Primary Indicators Of Performance**

The WIOA core programs provide data for federal reporting on the common indicators of performance required by section 116(b) of WIOA:

1. Employment in the 2nd quarter after program exit;
2. Education or training, or employment 2nd quarter after program exit (youth);
3. Employment in the 4th quarter after program exit;
4. Education or training, or employment 4th quarter after program exit (youth);
5. Median earnings in the 2nd quarter after program exit;
6. Postsecondary credential attainment during program participation or within 1 year after program exit or secondary school diploma or equivalent;
7. Measurable skill gains; and
8. Effectiveness in serving employers.

SCDEW provides a performance summary to local workforce development areas each quarter and annually. The summary includes each area's negotiated goal for each indicator, actual performance, and a percent of goal. Overall indicator and overall program scores are also provided for Title I and III programs.

The primary indicators of performance have been baseline for SCVRD and SCCB since the inception of WIOA. SCVRD has established area goals for the current fiscal year and has developed a report to monitor progress.

### State or Program Specific Indicators of Performance

#### Participant Cost Rate

The Participant Cost Rate Policy (State Instruction Letter 17-04, Change 1), requires that each LWDB meet a minimum participant cost rate of 30 percent. The annually evaluated rate is calculated using combined local WIOA Title I Adult and Dislocated Worker program expenditures, include carry-in and new funds.

#### Fund Utilization

The Fund Utilization Policy (State Instruction Letter 17-05) requires each LWDB to meet an annual 70 percent fund utilization rate for each of the WIOA Title I funding streams (Adult, Dislocated Worker, and Youth). The rate is calculated by dividing total program and administration expenditures by total available funds (carry-in and current annual allocation) for each funding stream.

#### Priority of Service

The Priority of Service Policy (State Instruction Letter 15-17, Change 2) requires that, for those Title I Adult participants receiving individualized career services and training, 70 percent be low-income or basic skills deficient. LWDBs are responsible for establishing local procedures to comply with this policy and for conducting outreach to these priority populations. Compliance with the policy is monitored through Ad Hoc Reports from SC Works Online Services.

#### Compliance Monitoring and Technical Assistance

The programs included in this plan each have a well-established process for program and financial monitoring to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and terms and conditions of contracts or grant agreements and that programs are being implemented as intended in an efficient and effective manner. The monitoring process helps identify opportunities for improvement resulting in recommended or required actions, such as technical assistance, including training, policy development, or implementation of promising practices.

## B. Assessment of One-Stop Partner Programs

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

By providing access to programs, activities, and services, SC Works partners contribute to the overall effectiveness of the workforce delivery system. The SC Works Certification Standards, which measure the effectiveness of system management and services to job seekers and employers, is the primary method used to assess core, mandatory, and optional partner programs and the effectiveness of South Carolina's one-stop system. State Instruction number 18-11 (SC Works Certification Standards) outlines Management, Job Seeker, and Business Services standards as well as baseline measures and proposed evaluations for each standard. Local workforce development boards submit Business Engagement and SC Works Operational plans, documentation of the SC Works certification standards assessment process, and documentation of a full certification determination to the state every three years. Centers were last certified in June 2019.

Included in the state instruction is the expectation for partner integration and efficient and effective service delivery through non-duplication of services, and an integrated staff development plan directing center partners to receive the same "next-steps" training to ensure each center staff member is aware of the full range of services provided by the system.

Each individual program has assessment processes in place, such as program performance, annual monitoring, and/or program needs assessment. SNAP Employment and Training is required to report outcome data in an annual report to monitor the effectiveness of programming. This annual report is monitored at the regional and national levels. TANF annual reports are required to monitor a variety of caseload data to include spending, work participation, and characteristics and financial circumstances. TAA is evaluated on a quarterly basis by DOL using the TAA Data Integrity (TAADI) Report Card consisting of sixteen (16) measures in financial and data reporting. Each quarter's evaluation and response will culminate in a year-end, annual report. Each measure's goal is set on a national level and is not negotiated on a state or local level. U.S. Department of Labor, Veterans' Employment and Training Service (VETS) conducts Triennial audits of each state's Jobs for Veterans State Grant (JVSG). The purpose of the audit is to determine compliance of the statutory roles and responsibilities of the JVSG-funded staff in South Carolina, as well as audit services to nonveterans.

## C. Previous Assessment Results

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

South Carolina has exceeded all negotiated performance indicators for the preceding 2 years - 2017 and 2018. Based on performance results and near future economic indicators, program year 2020 and 2021 performance indicator negotiations may see an increase in levels.

The review of previous assessment results enables the state to identify needs for targeted technical assistance and training. Additionally, assessment results help to inform state goals and priorities as well as resource investments.

#### D. Evaluation

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

South Carolina's history of conducting evaluations on WIOA and workforce strategies in general have been initiated under the direction of the State Workforce Development Board. The SWDB has identified the need for greater accountability and transparency in the delivery of services by analyzing the return-on-investment to identify solutions for building a talent pipeline. With representatives from the core partners as well as the educational system serving on the SWDB, the SWDB is uniquely positioned to identify where there is a need for further evaluations and to ensure cross-agency awareness and participation in the evaluations.

Ensuring both the emerging and existing workforce are aligned with high-growth, high-demand occupations must continue to be a priority for the state as we work to synchronize career-readiness strategies across education and workforce development. To put South Carolinians on a career pathway for family sustaining wages as well as maintaining good stewardship of public funds, it is important to actively engage businesses to identify skills that they have prioritized and to effectively use data analytics to determine whether citizens have access to relevant and effective education and training programs.

Over the next four years, South Carolina will be focused on increasing the post-secondary credential obtainment rate and investing significantly in public education and training. As such, we will need to provide evidence that the efforts to align workforce and education are effective with data demonstrating results.

Initiating and conducting this analysis will be the primary responsibility of a cross agency data team. The team will be mandated to compile and analyze data to understand how individuals enter and progress through the workforce. These analyses will provide the data-backed evidence to help inform workforce and education policy, future investments, and ongoing performance.

### 5. Distribution of Funds for Core Programs

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

#### A. For Title I Programs

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

##### i. Youth Activities In Accordance With WIOA Section 128(B)(2) OR (B)(3)

Title I Youth program funds are distributed to LWDAs according to the following fund allocation formula:

###### Youth Funds

- 33½ percent based on the relative number of unemployed individuals in areas of substantial unemployment in each workforce development area, compared to the total number of unemployed individuals in areas of substantial unemployment in the state;

- 33½ percent based on the relative excess number of unemployed individuals in each workforce development area, compared to the total excess number of unemployed individuals in the state; and
- 33½ percent based on the relative number of disadvantaged youth in each workforce development area, compared to the total number of disadvantaged youth in the state.

#### **Hold Harmless**

- Applies to each funding stream. Ensures that funds are distributed without significant shifts in funding levels.
- A local area will not receive an allocation percentage that is less than 90 percent of the average allocation percentage of the local area for the two preceding years.

#### **Title I Financial Reporting Requirements**

While the frequency of federal reporting to USDOL-ETA is quarterly, the state requires LWDAs to report obligations and accrued expenditures on a monthly basis. Monthly reporting allows the state to assist local areas with timelier technical assistance on financial issues identified in the monthly reports. More frequent reporting also ensures accuracy in the quarterly reporting to USDOL-ETA and facilitates overall fiscal management of grant funds. The state also requires more detailed expenditure reporting, to include staff salaries and fringe benefits, operating expenses, types of training expenditures, supportive services, etc. This level of detail allows for tracking and analysis of program costs in three major categories:

- Participants costs;
- Costs for staff providing services to participants and/or employers; and
- Other staff and operating expenses.

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

Title I Adult program funds are distributed to LWDAs according to the following fund allocation formula:

#### **Adult Funds**

- 33½ percent based on the relative number of unemployed individuals in areas of substantial unemployment within each workforce development area, compared to the total number of unemployed individuals in areas of substantial unemployment in the state;
- 33½ percent based on the relative excess number of unemployed individuals in each workforce development area, compared to the total excess number of unemployed individuals in the state; and
- 33½ percent based on the relative number of disadvantaged adults in each workforce development area, compared to the total number of disadvantaged adults in the state.

#### **Hold Harmless**

- Applies to each funding stream. Ensures that funds are distributed without significant shifts in funding levels.
- A local area will not receive an allocation percentage that is less than 90 percent of the average allocation percentage of the local area for the two preceding years.

#### **Title I Financial Reporting Requirements**

While the frequency of federal reporting to USDOL-ETA is quarterly, the state requires LWDAs to report obligations and accrued expenditures on a monthly basis. Monthly reporting allows the state to assist local areas with timelier technical assistance on financial issues identified in

the monthly reports. More frequent reporting also ensures accuracy in the quarterly reporting to USDOL-ETA and facilitates overall fiscal management of grant funds. The state also requires more detailed expenditure reporting, to include staff salaries and fringe benefits, operating expenses, types of training expenditures, supportive services, etc. This level of detail allows for tracking and analysis of program costs in three major categories:

- Participants costs;
- Costs for staff providing services to participants and/or employers; and
- Other staff and operating expenses.

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

Title I Dislocated Worker program funds are distributed to LWDAs according to the following fund allocation formula:

#### **Dislocated Worker Funds**

The distribution formula is based on the following factors and weights:

- |   |     |
|---|-----|
| • Insured Unemployment Data             | 30% |
| • Unemployment Concentrations           | 25% |
| • Mass Layoff Data                      | 10% |
| • Declining Industries Data             | 5%  |
| • Farmer-Rancher Economic Hardship Data | 5%  |
| • Long-Term Unemployment Data           | 25% |

#### **Hold Harmless**

- Applies to each funding stream. Ensures that funds are distributed without significant shifts in funding levels.
- A local area will not receive an allocation percentage that is less than 90 percent of the average allocation percentage of the local area for the two preceding years.

#### **Title I Financial Reporting Requirements**

While the frequency of federal reporting to USDOL-ETA is quarterly, the state requires LWDAs to report obligations and accrued expenditures on a monthly basis. Monthly reporting allows the state to assist local areas with timelier technical assistance on financial issues identified in the monthly reports. More frequent reporting also ensures accuracy in the quarterly reporting to USDOL-ETA and facilitates overall fiscal management of grant funds. The state also requires more detailed expenditure reporting, to include staff salaries and fringe benefits, operating expenses, types of training expenditures, supportive services, etc. This level of detail allows for tracking and analysis of program costs in three major categories:

- Participants costs;
- Costs for staff providing services to participants and/or employers; and
- Other staff and operating expenses.

**B. For Title II**

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

**Multi-Year Grants and Contracts**

The SC Department of Education (SCDE) is the state's eligible agency for adult education and literacy programs. SCDE's Office of Adult Education (OAE) is responsible for administering funds and providing program and performance oversight of adult education grantees. During the 2017-2018 grant year, OAE implemented a new competitive grant application process to identify, assess, and award multi-year adult education grants to eligible providers according to the Workforce Innovation & Opportunity Act (WIOA) of 2014. There will be a new grant competition conducted in the fall of 2020 to identify providers for the next grant cycle. The SCDE awards funds through a competitive sub-granting process to eligible local providers/applicants for the development, implementation, and improvement of adult education and literacy activities within South Carolina. Each eligible provider receiving a subgrant must use the funding to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. The same grant announcement, application, and process is used to award funds for AEFLA programs under sections 231 and 225. The AEFLA program under section 243 has a separate grant announcement and application process. AEFLA Section 231 (Grants and Contracts for Eligible Providers) grant funds are allocated on a county-wide basis to each of South Carolina's 46 counties. Data from the American Community Survey is used to identify the number of individuals needing literacy services within each county and the funding allocation per county. Award amounts are determined per program based on the quality of applications received and total funding requested and may vary depending upon program size, population (number of anticipated enrollees), and number of subgrants within the service area (i.e., county). An applicant may submit a single application to serve multiple counties. Final budgets may be negotiated based on demonstrated needs. All subgrants are contingent upon total allocations to the SCDE by the USED.

Section 225 (Corrections Education) grant funds are distributed state-wide based upon the number of applications received and proposed services to be provided. In the past grant cycle, funds were awarded to the Palmetto Unified School District and Adult Education Programs providing services through local detention centers.

In awarding IEL/CE funds, the OAE gives priority to areas where there are a significant number of English as a Second Language (ESL) individuals. The number or percentage of ESL adults is determined by the American Community Survey. In the past grant cycle, funds were awarded to 12 adult education providers, representing each of the 12 Workforce Areas in SC.

Initially, AEFLA grant funds for all three sections (231 funds, 225 funds, and 243 funds) were awarded to eligible providers for a three-year period, July 1, 2018 to June 30, 2021. Official grant award documents will be processed annually as continuation of funding is not automatic. In determining continuation funding, the SCDE considers the subgrantee's evidence of a project's effectiveness in achieving objectives, program performance, timely submission and quality of all required reports (including Interim and Annual Progress Reports), and the rationale for budget expenditures. A continuation application may be required.

The SC Department of Education – Office of Adult Education will issue a new Request for Proposals (RFP) for adult education services in the fall of 2020. The state's Request for Proposals (RFP) instructions will identify eligible providers as:

- Local education agencies
- Community-based or faith-based organizations
- Voluntary literacy organizations
- Institutions of higher learning
- Public or private nonprofit agencies
- Libraries
- Public housing authorities
- Other nonprofits that have the ability to provide literacy services
- Consortiums of organizations listed above
- Partnership between an employer and an entity listed above

As outlined in Section 463.24, an eligible provider must demonstrate effectiveness. To fulfill the demonstrated effectiveness requirement, applicants must submit its performance record and participant outcomes. Applicants must submit past performance data that includes participant outcomes data. An applicant that is unable to provide evidence of their demonstrated effectiveness in providing adult education and literacy activities will not be considered for funding, and their application will not be reviewed. The demonstrated effectiveness applies to all four subgrant programs (Adult Education, Corrections Education, GFS and IEL/CE).

An eligible provider must show demonstrated effectiveness in providing adult education and literacy activities by submitting:

1. Performance Record—includes performance data on improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of
  - reading,
  - writing,
  - mathematics, and
  - English language acquisition.
2. Participant Outcomes— includes data and/or information on outcomes for participants related to
  - employment,
  - attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training

All proposals are reviewed and rated on various elements to include demonstrated effectiveness as well as the 13 considerations in Title II of WIOA as identified in Section 231(e), LWDB local plan alignment, and partnership/collaboration.

#### *Considerations for Funding*

Applicants must demonstrate effectiveness and experience in providing the adult education and literacy services proposed in the application. Applicants must be in compliance with all state laws regarding the awarding of contracts and the expenditure of public funds. In addition, the funding agency shall consider:

- The degree to which the eligible provider would be responsive to regional needs and serving individuals in the community who were identified in the plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills or who are English language learners.
- The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.
- Past effectiveness of the eligible provider in improving the literacy of eligible individuals to meet state-adjusted levels of performance for the primary indicators of performance, especially with respect to eligible individuals who have low levels of literacy.
- The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan, as well as the activities and services of the One-Stop partners.
- Whether the eligible provider's program is of sufficient intensity and quality and based on the most rigorous research available so that participants achieve substantial learning gains and whether the program uses instructional practices that include the essential components of reading instruction.
- Whether the eligible provider's activities, including reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice.
- Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education, in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance.
- Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and exercise the rights and responsibilities of citizenship.
- Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the state, where applicable, and who have access to high-quality professional development, including through electronic means.
- Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, One-Stop Centers, job training programs, social service agencies, businesses, industries, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways.
- Whether the eligible provider's activities offer flexible schedules and coordination with federal, state, and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary

to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs.

- Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes and to monitor program performance.
- Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

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

The South Carolina Department of Education (SCDE) – Office of Adult Education (OAE) ensures that all eligible providers have direct and equitable access to apply and compete for grants and contracts under AEFLA. The entire RFP process, from beginning to end, is managed by the SCDE, and eligible providers submit proposals through the SCDE's grants submission system. Eligible applicants are not required to apply nor submit proposals through any other agency or agencies.

The SCDE – Office of Adult Education also ensures direct and equitable access in its processes and procedures related to the RFP announcement/distribution, the grant application, and technical assistance.

**RFP Announcement/Distribution:** Announcements of the availability of federal funds, under the auspices of WIOA – Title II, are circulated to the widest extent possible. Various sources and mediums are used to make the public and eligible providers aware of the RFP. SCDE's Public Information Office notifies the public, school districts, and other stakeholders. Grant opportunities are posted on the SC Department of Education's website and distributed via SCDE's GrantNews listserv. Announcements are forwarded to current adult education providers and organizations such as the SC Association of Nonprofit Organizations (SCANPO); the South Carolina Library Association (SCLA); South Carolina Technical Education Association (SCTEA); South Carolina Association of School Administrators (SCASA); and others.

South Carolina Department of Education - OAE will hold a full and open competition consistent with the standards of CFR 200.319. All eligible agencies will be granted direct and equitable access to apply and compete for grants or contracts. The OAE will be in compliance with all state and federal laws regarding the award of contracts and the expenditure of public funds as well as requirements outlined in Title II of the Workforce Innovation & Opportunity Act of 2014.

The following steps will be initiated to ensure direct and equitable access:

- The same grant and application process will be used for all eligible providers in the state.
- Standard criteria for evaluation of local proposals will be used for all eligible providers.
- Technical assistance workshops will be held to review the entire process and provide information to all eligible providers interested in applying. Dates, times, and places of these workshops will be included in the announcements and the Request for Proposal.

The announcement will contain information such as:

- Type of grants available
- Contact person to obtain RFP guidelines

- Timeline with grant application due date
- Other pertinent items
- Any information required by state law in regard to the awarding of contracts and the expenditure of public funds

## C. Vocational Rehabilitation Program

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

In South Carolina, vocational rehabilitation services are delivered by two agencies: SCVRD and SCCB. The Agencies maintain an agreement that outlines the roles and respective duties of each Agency. Federal grant funding is allocated as follows: 13 percent is allocated to SCCB and 87 percent is allocated to SCVRD. This is proportionally consistent with the client service and operational needs of the two agencies.

## 6. Program Data

### A. Data Alignment and Integration

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

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

South Carolina core partners currently use a variety of agency-specific data systems to manage service delivery (e.g. intake, application for services, case management, referrals, etc.) and to collect and report data. With the exception of SCDEW-administered programs, these systems do not exchange data in real time with other state partners, and each entity separately requests, receives, and reports education, employment, and other performance data. Effectiveness in Serving Employers data is gathered by SCDEW from all partners by use of a template of services and then de-duplication is performed on the data.

During initial development of the state plan, a work group was formed to assess the current operability of each core partner's information system. All partners agreed that a coordinated system would be more efficient and better support assessment and evaluation. Despite this common understanding, there are obvious barriers to the implementation of such a system, including the cost and overall feasibility. The work group participated in a number of system demonstrations, but ultimately determined that procuring a shared system or system "overlay" was not a viable option.

Moving forward, the state workgroup will be reengaged to further assess opportunities in moving forward with interoperable systems. Examples of states that have successfully implemented interoperable systems will be requested from our federal partners as foundational research for the state

partner group. The solicitation of support from the SWDB will be a critical step in assuring adoption of any workgroup recommendations.

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

There are no immediate plans to integrate data systems across the partners included in this plan; however, we are focusing on other vehicles for program and resource alignment such as co-enrollment and streamlined intake and referral processes.

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

While there is no immediate plan to procure or design a shared data system, the SWDB will be instrumental in developing shared strategies and enforcing operating policies that support system-wide co-enrollment, streamlined intake and referral, and shared accountability across system partners. Such strategies will improve participant and business outcomes by reducing duplication and ensuring the full breadth of services is made available in a coordinated manner.

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

Each program has a process for developing and producing reports required under Section 116:

**Title I Adult, Dislocated Worker, and Youth and Title III Wagner-Peyser Act Programs**

The State's management information system for Titles I and III is SC Works Online Services (SCWOS). The system captures most required performance data included in the Participant Individual Record Layout (PIRL), which is used for submission into ETA's Workforce Integrated Performance System (WIPS). Participant wage information is gathered through an interface with the state's UI system and the State Wage Interchange System (SWIS).

Once the PIRL is submitted (quarterly and annually) through WIPS, WIPS generates ETA-9173 (WIOA Quarterly Performance Report) and ETA-9169 (WIOA Annual Performance Report) reports for the state and each local workforce development area. In addition to the distribution of the WIPS-generated reports, the state issues summaries containing negotiated and actual performance indicator results for each LWDA.

The Workforce Support department provides quarterly reports to LWDAs, which outline the position of each area in regards to their performance and the South Carolina specific additional financial performance measures.

**Title II Adult Education and Family Literacy Act Program**

The SCDE Office of Adult Education utilizes the Literacy, Adult and Community Education System (LACES) to collect and analyze program data from local adult education programs throughout the state. Local providers input data into LACES on a regular basis. The data collected from this system is used for annual state and federal reporting, which includes the following:

- Student demographic information
- Student performance and outcomes
- Employment
- Post-secondary education and/or training

- Credential attainment

#### **Title IV Vocational Rehabilitation Act Programs**

SCVRD utilizes a Case Management System (CMS) developed in-house, as well as a companion program – New Federal Elements (also developed in-house) – to capture data included in the RSA-911 Case Service Report. Participant wage information is gathered through a data sharing agreement with the state’s UI system as well as supplemental wage verification methods. SCVRD has also signed on to the State Wage Interchange System (SWIS) as an access PACIA.

SCCB utilizes the AWARE case management system to capture and report data for the RSA 911. Post exit wage and employment information are obtained through UI wage match. Measurable skill gains and credential attainment are tracked through the MSG and Education pages in AWARE. AWARE also collects participant data for Pre-Employment Transition Services, Services to Employers, and Barriers to Employment. SCCB VR works with our in-house IT department and QA Department to provide AWARE user feedback to continuously enhance the efficiency of AWARE.

#### ***B. Assessment of Participants’ Post-program Success***

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

Primarily, programs will use the WIOA sec. 116(b) indicators of performance to assess participant success post- program. The applicable measures are:

- Employment during 2nd and 4th quarter after exit (adult/DW),
- Education, training, or employment 2nd and 4th quarter after exit (youth),
- Median earnings 2nd quarter after exit, and
- Credential attainment (during or) 1 year after program exit.

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

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

Wage data for performance accountability is made available through the state’s Unemployment Insurance System. Several programs, including Adult Education, SNAP E&T, and Vocational Rehabilitation, have agreements with SCDEW to obtain UI wage record data to assess and report performance.

SCDEW has data sharing agreements with State Wage Interchange System (SWIS) and South Carolina began using this system in January 2020. SCVRD uses The Work Number to obtain out-of-state wages and collects information about self-employment wages through a client or participant survey.

#### ***D. Privacy Safeguards***

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

The South Carolina workforce system complies with all federal and state laws and guidelines for the handling and protection of Personally Identifiable Information (PII), including but not limited to 2 CFR and TEGL 39-11, and ensures compliance through the following means: data sharing agreements with workforce partners, state and local memorandums of understanding (MOU), local area agreements, and resource sharing agreements. Additionally, PII is maintained and disposed of in a secure and confidential manner, and policies and procedures for the handling of PII are in place and reviewed regularly.

The SC Works Online Services system includes a privacy statement, as well as tips on how to protect against online scams and identify theft. The State's management information system also employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information and registrants are notified accordingly if any activity is noticed. Unless otherwise required, reports are typically aggregated to avoid disseminating individual student or participant data.

## 7. Priority of Service for Veterans

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

Veterans and other eligible persons, defined as covered persons, are ensured Priority of Service (POS) upon entering the Workforce System with the implementation of the following services:

- Identified at the point of entry to programs & services
- Made aware of priority of service
- Made aware of full array of programs and services available to them
- Take precedence over non-covered person in accessing and obtaining services

Covered person means any of the following individuals:

1. A veteran. The term means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U. S. C. 101. Active service includes full-time Federal service in the National Guard or a Reserve component.
2. The spouse of any of the following individuals:
  - Any veteran who died of a service-connected disability
  - Any member of the Armed Forces serving on active duty who, at the time of application for assistance under this section, is listed, by the secretary concerned in one or more of the following categories and has been so listed for a total of more than 90 days:
    - Missing in action
    - Captured in line of duty by hostile force
    - Forcibly detained or interned in line of duty by a foreign government or power
  - Any veteran who has a total disability resulting from a service-connected disability.
  - Any veteran who died while a disability so evaluated was in existence.

POS is defined as:

The right to take precedence over non-covered persons – Depending on the type of service or resource being provided, taking precedence may mean:

- Covered person gains access to services or resources earlier than the non-covered persons when resources are limited
- Priority of Service applies to every qualified job training program funded, in whole or in part, by the Department of Labor
- The proposal states that those with the greatest need should receive priority of service in programs for which they are eligible.

All covered persons are to receive POS at any “point of entry”, which includes physical locations, such as AJCs, as well as websites and other virtual service delivery resources. They must also have access to adult and dislocated worker programs.

POS is the responsibility of each staff member within the AJC with oversight and compliance provided by the One-Stop Operator. Reports and on-site reviews ensure adherence to mandated legislative requirements.

JVSG staff work closely with all WIOA partners providing training on current issues that affect Veterans and other eligible persons. The spirit of assisting Veterans and providing priority of service is primarily a legal requirement, but also a moral imperative and meaningful way of doing business.

### ***SBE Determination and Referral to DVOP:***

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Local AJCs must ensure that veterans and eligible persons are served first and that this protocol is addressed in the customer flow process. During the registration process, a series of questions identifies veteran status. Once the veteran or eligible person is identified, the first available WFC staff conducts an initial assessment. This initial assessment uses a customized Veteran Intake Survey, to help determine if the veteran or eligible person has a Significant Barrier to Employment (SBE) or that they may be a member of another special priority group. During the initial assessment if it is determined that the veteran has an SBE; they will be immediately referred to a Disabled Veterans Outreach Program Specialist (DVOP) or other trained staff for the provision of Individual Career Services and other services the veterans may need to meet their career goals.

### ***Monitoring Priority of Service:***

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The requirement to provide priority of service applies to all WIOA, Wagner-Peyser Act, discretionary grants, targeted programs (Senior Community Service Employment Program, Indian and Native American Programs, National Farmworkers Job Programs, and Trade Adjustment Assistance) and all other programs and services funded in whole or in part by the DOL. Agreement by a program operator to implement priority of service is a condition of receipt of DOL funds.

Monitoring will be performed by Veterans' Employment and Training Service, SCDEW and Program Operators responsible for the qualified job training program's administration and oversight. Program operators are required to ensure that priority of service is applied throughout their respective service delivery systems, including service delivery points maintained by all sub-recipients. It is expected that program operators will monitor local service delivery operations to ensure that their internal policies and procedures result in compliance with the priority of service requirements.

SCDEW will monitor priority of service to ensure that veterans and eligible spouses are made aware of and afforded priority of service. SC Works centers operate under the direction of an Operator. This assures that SCDEW, as well as all partner staff, is continually made aware of the established office policies and procedures and their responsibility to provide priority services to all veterans. At the SC

Works Center level monitoring of priority of service is conducted LVERs utilizing automated reports produced through South Carolina Works Online Services (SCWOS) and local office self-assessments. At the state level the Veteran Services Director utilizes the Manager's Quarterly Report on Services to Veterans, scheduled trainings, calls with program managers, and on-site visits at local Workforce Centers. SCDEW analyzes the data to ensure covered persons gain access to services or resources earlier than non-covered person, that priority of service is applied to every qualified job training program, and covered persons with the greatest need are receiving priority. Any compliant, non-compliant, or anomalies are reported through normal reporting channels.

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

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

South Carolina's one-stop delivery system is designed to be fully accessible so that all job seekers and employers can participate in the services offered. SCDEW's Nondiscrimination Plan (NDP) – a document required by the Civil Rights Center – is a "living" document that ensures current federal regulations and directives are implemented and monitored by both the State Office of Equal Opportunity and the Local EO Coordinators. The NDP details how compliance with WIOA Section 188 and 29CFR 38 will be accomplished.

Monitoring performed at both the state and local level ensures that all SC Works Centers are in compliance with Section 188 of WIOA, the ADAAA, and other applicable regulations. Individuals who seek to utilize South Carolina's workforce system can expect facilities, whether physical or virtual (e.g. SC Works Online Services) to meet federally-mandated accessibility standards. Complaints of discrimination are directed to the State Equal Opportunity Officer.

Per federal regulations, each LWDA must appoint a local Equal Opportunity Coordinator who is responsible for ensuring local WIOA Section 188 compliance. Local Equal Opportunity Coordinators are trained to use the "ADA Checklist for Readily Achievable Barrier Removal," the "Checklist for Existing Facilities," and a recommended assistive technology checklist. New local Equal Opportunity Coordinators are provided with detailed training on regulations, policies, and procedures following appointment. Ongoing training is provided through EO Roundtables and on-site training on such topics as, "Serving Customers with Disabilities," "Current EO Trends," as well as topics deemed relevant by LWDAs and designed in response to their training requests.

Local Equal Opportunity Coordinators are responsible for informing senior staff of applicable federal regulations, ensuring all programs and activities implemented are in compliance, and providing training for staff and center partners. Additionally, local Equal Opportunity Coordinators collect and resolve local grievances as needed. Each of the local Equal Opportunity Coordinators monitors for compliance independently and actively liaise with SCDEW's Office of Equal Opportunity and USDOL's Civil Rights Center to remain current on regulatory updates and guidance. They are then responsible for circulating new information locally and ensuring it is properly implemented.

Additionally, SCDEW issued State Instruction 14-03 requiring each LWDB to designate a standing committee that will provide information and assist with operational and other issues relating to the provision of services to individuals with disabilities. Members of these committees will be individuals who have specific expertise serving individuals with disabilities.

The OAE meets regularly with SCDE Office of Special Education Services to ensure compliance with all special education regulations. Additionally, OAE requires that all funded local providers have a written plan with local

Special Education Departments to transition IEP (Individualized Education Plan) students, and that local providers comply with the General Education Provisions Act (GEPA) which requires each provider to describe the steps they propose to take to ensure equitable access to, and participation in, its federally assisted programs. OAE monitors for compliance with the written transition IEP as part of its annual compliance process and collaborates with the Office of Special Education to monitor all other GEPA requirements and to provide training to local programs regarding serving students with special needs.

As a condition of partnering with SCVRD, other organizations are informed in the written agreement of their obligation to comply with applicable Civil Rights laws and regulations. Postsecondary training vendors are required to complete SCVR 153 – Assurance of Compliance with Section 504 of the Rehabilitation Act of 1973, as amended. This form acknowledges that the training vendor complied with Section 504, which ensured that individuals with disabilities have equal access to any federally funded program. The form is signed by the training vendor when the initial application is submitted for approval. Similarly, applicants, eligible individuals, and other interested persons are also informed in writing that services are provided on a nondiscriminatory basis, as required by Title VI of the Civil Rights Act, as amended, and Section 504 of the 1973 Rehabilitation Act, as amended. Additionally, all staff members are required to complete the Office of Civil Rights training modules.

As part of the SC Works center certification process, LWDBs are required to evaluate accessibility of the SC Works delivery system. Each center must meet the following accessibility baseline measures:

- The Center is compliant with the Americans with Disabilities Act (ADA). Every workforce area will work with Vocational Rehabilitation partners and SCDEW Office of Equal Opportunity, as needed, to ensure ADA compliance.
- The Center provides assistive technology for customers to use when accessing computers and other services. This includes customers with visual impairments, physical disabilities, and hearing impairments.
- Staff should be identified to assist people with disabilities at the first point of contact and in case of emergency.
- There are linkages to services for people with special needs, including veterans and others, related to disability.
- The center is accessible to the most prominent limited-English proficiency groups in the workforce area. Interpreter services are available, and staff is aware of how to provide when needed.
- The center provides free parking adequate for the average customer traffic flow.
- Centers have flexible scheduling and work hours, as appropriate; to better accommodate job seekers and employers.

These measures ensure that all South Carolinian's have equal access to workforce development activities and programs.

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

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

Languages other than English are identified at the point of first contact through Census language identification flash cards. To ensure the accurate transmittal of information, individuals with Limited English Proficiency (LEP) are provided services via a qualified interpreter service when qualified bilingual staff is not available. Each LWDA has submitted an LEP Plan of Action outlining procedures on identifying customer language needs, provision of services in the language identified, and the right to free language assistance. The LEP Plan of Action is an ongoing

process identifying procedures to meet the needs of LEP customers. A Request for Interpreter Service form has been made available to expedite the interpreter request process. Training on the provision of services to LEP individuals, as well as current interpretation resources and other materials, are provided on an ongoing basis. LEP individuals are notified of their rights under law via posters in Spanish and other significant language groups identified within each LWDA. As part of the SC Works center certification process, LWDBs are required to evaluate LEP accessibility.

When referrals occur from local one-stop delivery centers, adult education programs have a process to enroll these students into the program and provide appropriate English language instruction. Currently there are 33 programs for LEP adults in SC to serve individuals in need of English language instruction.

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

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

South Carolina's Combined Plan represents a co-created strategy for expanding and developing a skilled workforce and responsive workforce system. The plan covers the following programs:

- Adult, Dislocated Worker, and Youth
- Wagner-Peyser
- Jobs for Veterans State Grant
- Trade Adjustment Assistance
- Adult Education
- Vocational Rehabilitation
- Temporary Assistance for Needy Families
- Supplemental Nutrition Assistance

A representative(s) from each program participated on the State Plan Partner Work Group. The work group met regularly beginning in April 2019 to review the existing plan, identify areas of improvement, develop shared priorities and action items, and complete the USDOL required sections of the Combined State Plan. During the plan development process, key stakeholders were engaged through targeted focus group discussions and presentations to the State Workforce Development Board (SWDB). The Combined State Plan was published on February 28, 2020 for public comment.

## V. Common Assurances (For All Core Programs)

The Unified or Combined State Plan must include assurances that:

THE STATE PLAN MUST INCLUDE	INCLUDE
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes

THE STATE PLAN MUST INCLUDE	INCLUDE
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

# **VI. Program-Specific Requirements for Core Programs**

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

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

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

### **a. General Requirements**

#### ***1. Regions and Local Workforce Development Areas***

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A. Identify the regions and the local workforce development areas designated in the State  
South Carolina re-designated all 12 LWDAs that were designated as local areas for purposes of the Workforce Investment Act (WIA) and identified four (4) intrastate planning regions:

- Link Upstate – Greenville, Upper Savannah, Upstate, and WorkLink
- Central – Catawba, Lower Savannah, and Midlands
- Pee Dee – Pee Dee, Santee-Lynches, and Waccamaw
- South Coast – Lowcountry and Trident

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

State Instruction 14-05, Local Workforce Development Area Designation and Local Workforce Development Board Certification, outlines the process used for designating local areas. The policy defines "performed successfully" as meeting or exceeding the performance goals for the WIA common measures for each of the last two consecutive years for which data is available. It further provides that "sustained fiscal integrity" means that the Secretary has not made a formal determination, during either of the last two consecutive years, that either the grant recipient or the administrative entity of the area mis-expended funds provided under WIA due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration. Each local workforce area submitted a formal designation petition, including documentation of successful performance and fiscal integrity.

State Instruction 15-08, Regional Identification, provides an overview of the process used to identify planning regions. In making this determination, the state considered the factors listed in Sec. 106(b)(1)(B): the extent to which the local areas in a proposed region are consistent with labor market areas in the state, are consistent with regional economic development areas in the state, and have available the federal and non-federal resources necessary to effectively administer activities under subtitle B and other applicable provisions of WIOA. This also includes whether the areas have the

appropriate education and training providers, such as institutions of higher education and area career and technical education schools. South Carolina also considered population centers, labor force conditions, commuting patterns, industrial composition, location quotients, geographic boundaries, income, poverty, educational attainment, and in-demand occupation groups.

The data collected was examined by the cross-agency data-subcommittee and state workforce partners convened as part of the South Carolina Sector Strategies/Talent Pipeline Project. Four planning regions were identified and presented to workforce partners and stakeholders during a September 2015 webinar on WIOA Region Identification. There was a public comment period at the end of September; after reviewing the comments, the SWDB approved the planning regions as proposed in October 2015.

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

#### Appeal to the SWDB

A unit of local government (or combination of units) or a local area which has requested but has been denied its request for designation as a LWDA under 20 CFR § 679.250 may appeal the decision to the SWDB, in accordance with the State Plan, WIOA § 106(b)(5), and 20 CFR § 683.630(a). The appealing entity must explain why it believes the denial is contrary to the provisions of WIOA § 106(b)(2) or WIOA § 106(b)(3) and 20 CFR § 679.250. No other cause for appeal will be considered under this section.

Such a unit or local area may submit a written appeal to the SC Department of Employment and Workforce within thirty calendar days of the local area's being denied designation. If the thirtieth day falls on a weekend or holiday, the deadline will be extended to the next business day. Appeals must be submitted by registered mail, clearly identified as "Dated Material," and addressed to:

State Workforce Development Board  
C/O: SC Department of Employment and Workforce  
Attn: Workforce Support—Appeal of Denial of LWDA Designation, Suite 515  
P.O. Box 995  
Columbia, SC 29202

The following procedures will apply:

- The Chair will designate the Executive Committee or an Ad Hoc Committee of at least three SWDB members to hear the appeal.
- The designated SWDB representatives will hear the appeal and issue a written decision within sixty business days.

#### Appeal to the Secretary of Labor

A unit of general local government (including a combination of such units) or grant recipient whose appeal of the denial of a request for designation as a LWDA to the SWDB has not resulted in such designation, may appeal the SWDB's denial to the Secretary of Labor. Appeals must be filed no later than thirty days after receipt of written notification of the denial from the SWDB, and must be submitted by certified mail, return receipt requested, to the Secretary:

U.S. Department of Labor  
Attn: ASET  
200 Constitution Ave. NW  
Washington, DC 20210

The appellant must establish that the petitioning LWDA was not afforded procedural rights under the state appeal process described in the State Plan or establish that the entity meets the

requirements of WIOA § 106(b)(2) or WIOA § 106(b)(3) and 20 CFR § 679.250. If the Secretary determines that the appellant has met its burden of establishing one of these allegations, the Secretary may require that the area be designated as a LWDA. In making this determination, the Secretary may consider any comments submitted by the SWDB in response to the appeal. The Secretary will issue a written decision to the Governor and the appellant.

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

If the Local Board and required partners fail to reach consensus on funding infrastructure costs under the Local Funding Mechanism (LFM), the State Funding Mechanism (SFM) is triggered. Under the SFM, the Governor is required to determine the partners' contributions for infrastructure costs for local areas that have not reached consensus, applying statutory caps specified by WIOA for certain programs. The SFM is only applicable to required partners and cannot be triggered by additional partners not reaching consensus. Even if all required partners except one agree on the terms of the IFA, consensus is not reached, and the SFM is triggered for all partners in the local area. The SFM's programmatic caps create uncertainty for local partners regarding how much they will be required to contribute toward infrastructure costs and the level of service they will be able to provide to their participants. It is the expectation that Local Boards and partners reach consensus on infrastructure funding during local negotiations, thus avoiding the necessity of utilizing the SFM.

##### State Funding Mechanism Steps:

1. Notice of failure to reach consensus given to the Governor. If the Local Board cannot reach consensus with partners on sufficiently funding infrastructure costs and the amounts to be contributed by each partner program locally, the Local Board is required to notify the State by August 15 annually via submission of the *Report of Outcomes from Local MOU Negotiations*, an attachment to State Instruction 16-19, Change II issued by the State regarding local MOU/IFAs. Additionally, the Local Board must submit all materials and documents used in negotiations under the LFM in order to assist the Governor in determining appropriate calculations by partner program.
2. The Governor determines the infrastructure budget for each center in a local area.
3. The Governor establishes cost allocation method(s).
4. The Governor determines the partners' proportionate shares.
5. The Governor calculates the statewide partner program caps using the limiting percentages required under WIOA.
6. The Governor must ensure that the funds required to be contributed by each partner program in the local area(s) that did not reach consensus, do not exceed the applicable program caps. The partners' proportionate shares must be adjusted if necessary.

**Appealing the State Funding Mechanism:** All Parties will actively participate in local IFA negotiations in a good faith effort to reach agreement. Any disputes shall first be attempted to be resolved informally. Any party may call a meeting to discuss and resolve disputes. Should the Local Board become unable to reach consensus with local partners regarding infrastructure funding, the Governor will make the final determination of each required partner's proportionate share of infrastructure costs under the SFM as described above. Appeals must be made to the SWDB within 14 days of the Governor's determination and submitted in writing as follows:

South Carolina Department of Employment and Workforce  
Attn: Appeals, State Workforce Development Board  
1550 Gadsden Street

Columbia, SC 29201

## 2. Statewide Activities

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

South Carolina has a number of policies that govern the workforce development system and its programs as a whole, including but not limited to the following:

- State Instruction 16-19, Change 1 and Change 2 – Local MOU Guidelines
- State instruction 17-03, Change 1 – Incumbent Worker Training
- State Instruction 18-01 – Individual Employment Plans
- State Instruction 18-06 – Youth Objective Assessments and Individual Service Strategies
- State Instruction 18-11 – SC Works Certification Standards

Active and expired policies can be found on the SC Works.org website under the Policies and Guidance page: <https://scworks.org/workforce-system/policies-and-guidance>.

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

#### Statewide Activities

The SWDB retains 10 percent of the Governor's set aside to incubate promising workforce development, education, and training models. Funding proposals are developed by SWDB leadership, staff and key stakeholders, based on the priorities identified in the WIOA State Plan and SWDB Strategic Plan. Proposals are presented to the SWDB for review, discussion, and approval.

Current activities funded through the Governor's set aside include: incumbent worker training, training and professional development for SC Works center staff, and support for sector partnerships.

#### State Administration

DEW retains 5 percent of the Governor's set aside for state-level administration of the Title I Adult, Dislocated Worker, and Youth programs, including administrative support to the SWDB.

#### Use of Rapid Response Funds

Fifteen percent of Dislocated Worker funds are used to manage Rapid Response services, which include planning for and responding to layoffs and closures. Rapid Response services are designed to provide early intervention assistance to businesses faced with closures or layoffs and to provide dislocated workers with information and resources to quickly seek and obtain alternate employment. DEW uses a proactive, comprehensive approach to Rapid Response by identifying, planning and responding to layoffs, and preventing or minimizing the impact of layoffs wherever possible.

SCDEW's proactive and comprehensive approach is organized in the following process:

- **Stage 1:** Discovery and Notification. Once the Rapid Reemployment Team receives notification of a potential layoff or closure, the team assesses the situation by

gathering information/facts, preparing materials, and identifying potential tactics for layoff aversion and analyzing industry and occupational trends to identify whether the business and impacted workers will need short-term or more sustainable services.

- **Stage 2:** Management Meeting. At an initial meeting, circumstances for the anticipated layoff are discussed along with the demographics of affected workers. Descriptions of Group Informational Sessions and Onsite Services are provided to the employer.
- **Stage 3:** Group Informational Sessions. The purpose of this session, is to inform impacted workers of available reemployment services and prepare them for job search activity prior to their anticipated layoff.
- **Stage 4:** Onsite Reemployment Services. This provides customized services which address workers' unique needs for reducing unemployment. These services consist of resume building, interviewing skills, job searching, SCWOS registration, computer literacy, UI portal registration, and job fairs.

The Rapid Response team works closely with the Existing Industry Division at the South Carolina Department of Commerce (SCDOC). The Existing Industry Division provides referrals and coordinates with the DEW Rapid Response team to provide services to employers who may be experiencing a layoff or closure.

Rapid response funds are used to provide Incumbent Worker Training (IWT) to businesses at risk of imminent layoffs or closures. Once a company completes an application, local areas review the training application, assess the business, the worker group and proposed training prior to endorsing the application and forwarding it to DEW for final funding approval. In determining whether to fund Rapid Response IWT applications, training is evaluated to ensure the skills are transferrable to future employment opportunities if the aversion strategy is unsuccessful. Rapid Response funded IWT is approved only if a credential or certification is issued.

Rapid Response funds are also used to supplement local funds in serving dislocated workers. This additional assistance provides training, supportive services, and increased front-line staff when needed to meet local needs. Given the size and location of a layoff, Rapid Response funds will assist with establishing transition centers specifically designed to increase the capacity and accessibility of services needed quickly for large numbers of laid off workers.

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

#### Natural Disaster Rapid Response

In the case of a disaster declaration, workforce services and recovery efforts are coordinated with FEMA and the SC Emergency Management Division. Rapid Response staff assists in the identification of businesses adversely affected and workers who lost jobs as a result of the disaster. Information is disseminated on disaster unemployment assistance and reemployment services available. Relevant to public assistance declarations, staff coordinates with local areas to determine if applying for a National Dislocated Worker Grant is needed to secure additional funding for cleanup and/or humanitarian efforts. The state coordinates with FEMA to ensure non-duplication and adherence to maintenance of effort requirements.

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

#### TAA/Rapid Response Early Intervention

The South Carolina Department of Employment and Workforce (SCDEW) administers the Trade Adjustment Assistance (TAA) Program, providing early intervention to worker groups on whose behalf a TAA petition has been filed.

DEW leads Rapid Response efforts across the state. When working with a business to provide Rapid Response services, DEW staff activates team efforts locally. Whenever possible, the team conducts on-site presentations at the business location. Every effort is made to provide information sessions prior to the commencement of the lay-off and/or plant closure. The presentation consists of an overview of the benefits and services that can be expected from each of the partner groups. During these sessions, the Rapid Response team emphasizes how the partner agency staff representatives will be working together as a team to offer the customer individualized and comprehensive reemployment benefits and services.

Once a petition is approved, additional sessions with affected workers are scheduled to provide information about TAA services only and enroll affected workers into the TAA program. These sessions give the workers the opportunity to ask detailed questions and may be set up through the employer, if the business is still open, or through TAA staff at the nearest SC Works center, or at another convenient location.

When an individual enters the SC Works center and is identified as TAA eligible, a Trade Workforce Specialist provides the impacted worker with a one-on-one orientation to explain available Trade benefits and services.

#### Utilization of Rapid Response Funds for TAA Eligible Individuals

Funds are used for TAA staff to monitor, identify, and communicate available benefits with worker groups that file a TAA petition.

### b. Adult and Dislocated Workers Program Requirements

#### 1. Work-Based Training Models

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

#### Work-Based Training Models

Many of SC's workforce training initiatives implemented at both the state and local levels utilize work-based training models, such as On-The-Job-Training and Incumbent Worker Training. These initiatives are discussed throughout the plan in much greater detail.

## 2. Registered Apprenticeship

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

### Registered Apprenticeship

The growth of Registered Apprenticeship in South Carolina has been phenomenal and because of its innovative approach and fast growth, Apprenticeship Carolina™ is held as a model for the nation.

Having exceeded our “20,000 Apprenticeships by 2020” goal, South Carolina is well positioned to provide the services and training under adult registered apprenticeships for in-school and at-risk youth. Under the Education and Economic Development Act Coordinating Council, SC Department of Education, the State Technical College System, SC Department of Employment and Workforce, the State Chamber of Commerce and many other stakeholders, are establishing mutual goals around increasing the number of youth apprentices. While much of the early work around youth apprenticeships can be attributed to Trident Technical College, multiple technical colleges around the state are working with local school districts and business partners to promote youth apprenticeships. With the heavy emphasis on registered apprenticeships as the premier training tool, the SWDB has identified increasing registered apprenticeships as a top priority. As such, efforts are underway to promote registered apprenticeship opportunities for individuals who face barriers to employment through community organizations such as housing authorities and tradesman.

The Palmetto Academic Training hub (PATH) a major resource used in advertising and connecting individuals to registered apprenticeships. PATH is used to make program information about registered apprenticeships available to the public. Title I case managers use the list of registered apprenticeships to inform participants of the career and training options available.

## 3. Training Provider Eligibility Procedure

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

### TRAINING PROVIDER ELIGIBILITY

An eligible training provider is an entity that has met the eligibility requirements to receive funding through an Individual Training Account (ITA) to provide training services to eligible individuals.

To be an eligible training provider, an entity must qualify as one of the following:

- Institution of higher education that provides a program of training that leads to a recognized postsecondary credential;
- Apprenticeship programs, including Industry Recognized Apprenticeship Programs (IRAPs) and Registered Apprenticeship Programs (RAP);
- Public or private training providers, including community-based organizations, joint labor-management organizations, pre-apprenticeship programs, and occupational/technical training; or
- Providers of adult education and literacy activities if such activities are provided concurrently or in combination with other training services.

The eligible training provider must provide a program of services that leads to:

- An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State or the Federal government, a postsecondary credential;
- A secondary school diploma or its equivalent if such activities are provided in combination with other training services;
- Employment; or
- Measurable skill gains toward a recognized credential or employment.

In addition to the required eligible training provider qualifications listed above, all training providers must:

- Be a legal entity
- Be registered or licensed by the appropriate governing board or agency prior to applying for placement on the ETPL
- Provide an appropriate program of training services
- Have the ability to do all of the following:
  - Offer programs that lead to recognized postsecondary credentials or certifications
  - Meet the needs of local employers and participants
  - Serve individuals with barriers to employment
- Have refund policies specifying when refunds for tuition and other costs associated with the training program will be allowed that are in writing and are published to ensure students are aware of how to request a refund
- Have a written grievance policy for students to file complaints within an organization against faculty, staff, or other employees that is published to ensure that students are aware of how to file a complaint
- Comply with all applicable non-discrimination and equal opportunity provisions as potential recipients of WIOA funds, in accordance with WIOA § 188

### Initial Eligibility and Application Process for New Training Providers

Training providers and programs seeking approval for initial eligibility on the South Carolina ETPL must apply online by submitting an application through the Palmetto Academic Training Hub (PATh) website at [www.scpath.org](http://www.scpath.org). New training providers and programs will be continually added to the ETPL as they become eligible and approved. Once approved, initial eligibility status remains in effect for one (1) year. After the initial eligibility period expires, training providers and each program of training are subject to procedures for continued eligibility status.

A training provider seeking to be certified as an eligible training provider on the South Carolina ETPL must provide all of the following:

- A completed ETPL application in PATh, which must include:
  - Descriptions of each program of training services to be offered;
    - Program-specific performance information based on South Carolina's identified factor related to the WIOA performance indicators (employment 2nd & 4th Quarter after exit, median earnings 2nd Quarter after exit, credential attainment). In determining initial eligibility, starting January 1, 2021, ETP's submitting new programs of training must provide the state the credential attainment rate from the previous program year (July 1st - June 30th) for each program of training via PATh. South Carolina is choosing to use program years'

2020-2021, ETP initial credential attainment data to establish a baseline for the program minimum performance benchmark;

- Identification of businesses that developed the training in partnership with the provider, if any;
- Description of how the program of training services aligns with in-demand industry sectors and occupations, to the extent possible;
- Information on cost of attendance, including costs of tuition and fees;
- A signed Memorandum of Agreement (MOA) in which the provider agrees to share data with the State pertaining to training outcomes, including individual student coursework and other Personally Identifying Information (PII) to match training and employment data and outcomes for all students, including WIOA-funded students and non-WIOA-funded students.

The State will review the application content in PATH to ensure all required information has been submitted correctly and make a content-only determination within 15 calendar days of the initial application. Once a baseline is established and a minimum credential attainment rate is set, South Carolina will revise the process for assessing the initial eligibility criteria. If an application is determined to be incomplete, the training provider will be notified and the application will remain open for a period of 60 calendar days from the date of receipt. If a provider fails to submit all required information or materials within this 60 day period, the State will deny the application. The training provider may resubmit an application at any time. Upon content-only approval by the State, the application will be sent to all applicable Local Workforce Development Areas (LWDAs), as the Local Workforce Development Boards (LWDBs) hold the final approval authority for each local area in which the training provider is located or providing training services. A training provider and at least one program of training must be approved by a minimum of one LWDA in order to be published on the ETPL.

### **Continued Eligibility Application Process**

After the initial eligibility period of one (1) year, the training provider, with the exception of registered apprenticeship program sponsors, must submit an application for continued eligibility for each program of training and resubmit every year thereafter. The continued eligibility application requirement ensures that training provider and program information is accurate and performance reporting standards are met. The continued eligibility application is required for any program of training that has been previously approved for the ETPL. A system generated email notification will be sent to the provider's listed point of contact 60 days prior to the expiration of a program's approval status.

A training provider seeking continued eligibility approval must provide all of the following in PATH:

- Any changes to provider or program information previously approved must be submitted, including a current program description, breakdown of tuition costs and fees, credentials to be attained, and contact information;
- A signed MOA in which the provider agrees to share data with the State pertaining to training outcomes, including individual student coursework and other PII to match training and employment data and outcomes for all students, including WIOA-funded students and non-WIOA-funded students.

In making an eligibility determination, the State will consider the following:

- ETP performance on WIOA performance indicators (employment 2nd & 4th Quarter after exit, median earnings 2nd Quarter after exit, credential attainment). As required for the demonstration of continued eligibility, training providers are required to submit performance information via PATH for all students engaged in approved programs of

training listed on the ETPL, regardless of funding source, no later than September 15th of each year for the previous program year (July 1st - June 30th). South Carolina is choosing to use program years' 2020-2021 ETP performance reporting data in conjunction with program years 2018-2019 to establish a baseline for determining the state's ETP goals for the four aforementioned WIOA performance indicators. Until a baseline is established and the state's ETP goals are set, we are unable to determine the threshold for acceptable/unacceptable performance;

- Quality of the program of training services including programs leading to a recognized postsecondary credential. Until a baseline is established and the state's ETP goals are set, we are unable to establish a metric to be used to determine quality;
- Description of the accessibility of training services throughout the state, including in rural areas, and through the use of technology;
- The degree to which training programs relate to in-demand industry sectors and occupations in the state;
- Documentation of compliance with all state licensure requirements and the current licensing status, as applicable;
- Evidence indicating the training program leads to an industry recognized certificate or credential, including any recognized post-secondary credentials;
- ETP's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities;
- Information reported to state agencies on Federal and State training programs other than WIOA title I-B programs;
- Timeliness and accuracy of ETP's performance reports.

The State will review the application content in PATH to ensure all required information has been submitted correctly and make a content-only determination within 15 calendar days of the application. Once a baseline is established and the state's ETP goals are set, South Carolina will revise the process for assessing the continuing eligibility criteria. The State shall notify a provider if an application is determined to be incomplete and shall keep the application open for a period of 60 calendar days from the date of receipt. If a provider fails to submit all required information or materials within this 60-day period, the State will deny the application. The training provider may resubmit an application for continued eligibility at any time once all required data has been submitted. ETPL training providers are responsible for maintaining up-to-date information for the ETPL in PATH to continue receiving WIOA training referrals and funds. Failure to update program information may result in removal of the program from the ETPL. Any significant change to a program, including a change in the program's cost, may require re-evaluation for approval.

#### **Training Provider or Program Denial, Removal and Appeal Process**

A training provider must deliver results and provide accurate information in order to retain its status as an approved eligible training provider under WIOA. The state or a LWDB can deny inclusion of, or remove, a training provider and/or its program(s) from the ETPL for reasons, including the following:

- The initial or continued application is not completed by an established due date or is missing required information;

- The training does not lead to a recognized post-secondary credential or an industry-recognized certificate or certification, a secondary school diploma or its equivalent, employment, or measurable skill gains toward such a credential or employment;
- The required student data is not submitted by the established due date;
- The training provider intentionally supplies inaccurate or falsified information;
- The training provider substantially violates any requirement under WIOA, its implementing regulations, or applicable State or local policies;
- The training provider loses its license or accreditation from its accrediting body;
- The provider or program fails to meet locally established minimum levels of performance; or
- The entity does not meet the WIOA definition of a provider of training.

In addition to the above, a LWDB may require additional criteria and information from local training providers to become or remain eligible in that area.

Programs of training that have been removed from or denied listing on the ETPL may be reinstated after one year by applying through the initial application process. If removal was due to willful submission of inaccurate information, the program of training may be reinstated on the ETPL after two years by applying through the initial application process.

Repeated failures to submit required information and a failure to cooperate with LWDB's will be considered in the state determining whether a "substantial violation" occurred. "Substantial violation" may be interpreted to be one or more violations in a short period of time or numerous minor violations over a longer period of time. A provider whose eligibility is terminated under these conditions must be terminated for not less than two years and is liable to repay training funds received during the period of noncompliance.

In the event that a training program is removed from the ETPL, the state and the LWDB will work together to ensure that any participants currently enrolled in that training program experience minimal disruption.

A training provider that is denied inclusion or removed from the ETPL by a LWDB may file an appeal with the LWDB. A provider choosing to appeal must submit a written appeal to the denying LWDB in accordance with their local ETPL policy. If a training provider chooses to appeal the LWDB's final determination, a written appeal to the state must be submitted within 30 calendar days of the issuance of the LWDB's final appeal decision. The appeal must include the following information:

- A statement of the desire to appeal;
- A description of the program in question; and
- Detailed justification for gaining or retaining approval, including all supporting facts.

Appeals must be submitted by registered mail, clearly identified as "Dated Material," and addressed to:

SC Department of Employment and Workforce  
Attn: Workforce Support—ETPL Request to Appeal, Suite 515  
P.O. Box 995  
Columbia, SC 29202

If the 30<sup>th</sup> day falls on a weekend or holiday, the deadline will be extended to the next business day. The state will not consider any factual or legal grounds for relief that are not set forth in the original appeal filed with the LWDB.

A DEW program staff member designated by the Assistant Executive Director of Workforce Development will review the appeal and attempt to resolve the appeal informally within 15 days of the appeal file date. The appeal request will be referred to the State ETPL Committee if it is not successfully resolved within 15 calendar days of the appeal file date. The State ETPL Committee, comprised of two staff members from DEW's Division of Workforce Development and one staff member from DEW's Technical Services, Policies, and Reporting, will conduct a hearing and issue a written determination to the training provider. The State ETPL Committee's determination must be mailed within 60 calendar days of the appeal file date.

A decision of the State ETPL Committee is not appealable to the Secretary of Labor.

Any and all alleged violations of discrimination under protected bases will be directed to the Office of Equal Opportunity for investigation. Any subsequent decision regarding the inclusion, or removal, of a training provider and/ or its program(s) from the ETPL will be made by the Equal Opportunity (EO) Officer.

If a training provider is found to have intentionally provided inaccurate information or substantially violated any WIOA requirements, then the provider must be removed from the list of eligible training providers, and the provider's eligibility to receive funds will be terminated for a period of not less than two years.

For questions regarding the ETPL appeal process, contact [WorkforceSupport@dew.sc.gov](mailto:WorkforceSupport@dew.sc.gov). Appeals may not be sent via this email address.

### Registered Apprenticeship

Apprenticeship programs registered with the U.S. Department of Labor's (DOL's), Office of Apprenticeship (OA), are automatically eligible to be included on the ETPL. While automatically eligible, a registered apprenticeship program sponsor must first indicate their interest in being included on the ETPL. SCDEW developed a registered apprenticeship program sponsor ETPL inclusion notification. The inclusion notification is emailed with assistance from the DOL OA, semi-annually to each registered apprenticeship program sponsor within South Carolina, informing apprenticeship sponsors of their ETPL automatic eligibility by virtue of their registration with DOL. The ETPL inclusion notification is also made available to the LWDA's and members of the public through the SC Works and PATH websites. Registered apprenticeship program sponsors may request, at any time, to be added to the ETPL as an approved training provider. Any such requests must be communicated to DEW through the completion of an abbreviated application accessed through the PATH online system. For inclusion on the ETPL, registered apprenticeship program providers must provide the following information:

- Occupations included within the registered apprenticeship program,
- The name and address of the registered apprenticeship program sponsor,
- The name and address of the Related Technical Instruction (RTI) provider and the location of instruction if different from the sponsor's address,
- The method and length of instruction, and
- The number of active apprentices

Registered apprenticeship program sponsors that do not provide the RTI portion of the apprenticeship program may be requested to provide additional information about their education provider, including the cost of the instruction. Registered apprenticeship program sponsors that request to be included on

the ETPL will remain as long as the program is registered or until the program sponsor submits notification that it no longer wishes to be on the list.

Registered Apprenticeship programs are not subject to the same eligibility, performance, or reporting requirements as other training providers since they go through a detailed application, vetting, and monitoring process with the USDOL. Registered apprenticeship programs are exempt from WIOA performance and reporting-related requirements, including the requirements for annual eligible training provider reporting, enabling these programs to be placed on the ETPL with minimal burden.

LWDBs may not impose additional requirements on registered apprenticeship program sponsors. Additionally, it is not necessary for LWDAs to determine if a registered apprenticeship program is on their local in-demand occupation list. Registered apprenticeship programs included on the ETPL are automatically considered to be an in-demand training, if the program's selection process is open.

Pre-apprenticeship programs do not have the same automatic eligible training provider status under WIOA, and are required to go through the same vetting process and performance reporting requirements as all other training providers in the State. Pre-apprenticeship programs funded with WIOA funds must have at least one Registered Apprenticeship partner; such pre-apprenticeship programs must possess or develop a strong record of enrolling their pre-apprenticeship graduates into a Registered Apprenticeship program.

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

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**Priority of Services for Public Assistance Recipients and Low-Income Individuals**

The state issued policy regarding priority of service under the adult program to ensure consistent application of the priority of service requirement, and to provide a more quantifiable definition for basic skills deficient. For those Title I Adult participants receiving individualized career services and training, the policy required that 70 percent be low-income or basic skills deficient. LWDBs are responsible for establishing local procedures to comply with this policy and for conducting outreach to these priority populations. Compliance with the policy is monitored through Ad Hoc Reports from our participant data system.

***5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs***

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**Criteria for Local Transfer of Funds**

Local workforce areas may request approval from DEW to transfer funds between the adult and dislocated worker fund streams. Transfer requests must be made in writing to the state via a "Fund Transfer Request Form" any time after receipt of the corresponding fiscal year funds authorization, typically in October of each year. Each transfer request must provide sufficient justification regarding the percentage of formula allocation being requested. The issuance of an adjusted Notice of Funds Authorization (NFA) reflecting funds earmarked for another program (e.g., Dislocated Worker funds for Adult), serves as the local workforce area's official notification that the transfer is approved.

**c. With respect to youth workforce investment activities authorized in section 129 of WIOA—**

With respect to youth workforce investment activities authorized in section 129 of WIOA—

- 1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.[11]*

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[11] Sec. 102(b)(2)(D)(i)(V)

**State Criteria for Awarding Grants to Youth Providers**

South Carolina has placed a high emphasis on providing quality education, training, and employment opportunities for disconnected youth. State instruction 14-03 requires local boards to have a standing committee which provides information and assists with planning, operational, and other issues related to the provision of services to youth. These committees will play a critical role in the selection and evaluation of youth service providers.

To ensure all WIOA Youth Service Providers meet basic programmatic standards, the state has developed the following criteria for LWDAs to consider during their provider selection process:

1. Providers must demonstrate experience and expertise in addressing the employment, training, or education needs of eligible youth, specifically out-of-school (OSY) or disconnected youth.
2. Providers must demonstrate experience and/or strategies in connecting youth to education, training and employment opportunities with emphasis on career readiness activities and promoting career pathways for participants.
3. Providers must exhibit strong community and business linkages to ensure the ability to develop work-based learning opportunities and meet the skill and training needs for the state's talent pipeline.
4. Providers must demonstrate ability to meet performance accountability measures through program design and strategies.

As the WIOA statute mandates, 75 percent of youth funds are to be expended on the OSY population. Local areas support this requirement by requiring prospective youth providers to have direct experience in serving priority populations and be able to illustrate strategies that motivate and engage youth with barriers.

In recent years, the business community has stressed the importance of soft skills and career readiness characteristics in youth and young adults. Recognizing the need, workforce development in South Carolina has integrated a stronger career ready component in program designs. Youth providers are expected to offer an intensive soft skills curriculum to ensure individuals are prepared for the behavioral aspects of entering the workforce. Providers that incorporate career academy models in conjunction with work-based learning to expose participants to the expectations of employers and workforce needs will increase placements and job retention for the area.

Understanding that youth providers may not be able to directly offer each of the 14 elements described in WIOA section 129(c)(2), youth providers will be responsible for connecting with other workforce and

community partners to achieve a holistic service delivery model. It is imperative that providers communicate closely with agencies and organizations that serve similar populations to allow for co-enrollment where appropriate and leveraging of resources. As formula funding has seen a decrease, local areas are faced with the challenge of providing quality services to individuals in need with less staff and financial resources. Providers must be imbedded in their respective areas to build mutually beneficial partnerships that generate referral processes, space sharing, and alternative funding.

With WIOA's focus on work-based learning opportunities for youth, providers are charged with working closely with the business community. With the 20 percent expenditure requirement in WIOA Sec. 129(c)(4) combined with low unemployment rates, workforce development in South Carolina is strategizing to engage and offer solutions to employers that will allow for younger generations to fill entry level positions. Providers present strategies that will create work-based learning and employment opportunities for the program participants, but also serve business and industry.

Performance measures are an indicator of consistent, effective and sustainable program models. Prospective providers must be able to present data to support their service delivery. For past WIOA youth providers, the proposal must report performance outcomes for at least the previous two program years, if applicable. Providers must speak to their ability and strategies to meet the performance measures for WIOA.

State Instruction 17-07 was issued to prevent potential conflicts of interest by requiring direct providers of Title I services to be competitively procured, while prohibiting an entity providing oversight and administrative services in a local workforce area from also providing operational services for youth, adults or dislocated workers under Title I. Additionally, local areas are expected to ensure compliance with procurement provisions at the Federal, State, and local levels including 2 CFR 200. The State conducts monitoring and oversight activities of youth provider procurement and service delivery efforts to provide strategic direction and promote continuous improvement initiatives.

***2. Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.***

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**Strategies to Improve Outcomes for Out Of School Youth**

Historically, South Carolina has served a predominately out-of-school youth (OSY) population with successful outcomes. The state is well-positioned to continue this trend. There are several strategies in development that will help improve outcomes for OSY:

**SWDB Priority Populations Committee.** The Priority Populations Committee of the SWDB provides strategic direction and oversight and sets policy for the state with regard to services to youth, individuals with disabilities, veterans, and other populations that face barriers to employment. The direction and oversight of this committee will lead to improved outcomes for OSY youth.

**LWDB Youth Committees.** Each LWDB is required to form a Youth Committee that provides information and assists with operational and other issues relating to the provision of services to youth. The Youth Committee is charged with developing local service strategies that will increase the number of OSY served and improve outcomes for this population. The statewide Priority Populations Coordinator works with each LWDA to ensure that their Youth Committee is engaged in State initiatives and collaborating with key partners. All 12 LWDAs have standing Youth Committees.

**Aligning Programs and Services.** Aligning programs and services through co-enrollment and referral processes has historically increased the number of individuals served and generally improved outcomes. South Carolina will continue to achieve the 75 percent OSY expenditure requirement due to alignment strategies such as co-location and co-enrollment practices. Although the graduation rate continues to improve, South Carolina's Title I youth programs serve a high number of youth who have dropped out of secondary school. Seeing the overlap in customers, LWDA's have chosen to co-locate with Adult Education Providers to promote communication between provider staff and effectively recruit OSY and serve co-enrolled participants. Co-locating with Adult Education, allows those individuals who engage in equivalency programs to access the extra supports and services that WIOA provides. Additionally, the comprehensive SC Works centers are equipped to serve the OSY population and connect them to the many services, programs and partners represented. Some of the centers actually offer basic skills and equivalency classes on site, further providing a holistic approach to serving youth.

Another opportunity for increased program alignment is with the Local Workforce Development Board Youth and Disability Committees. Each local area has created a LWDB committee to address the needs of youth and one to ensure outreach and services for people with disabilities in the workforce. With Vocational Rehabilitation taking a leading role in the Disability Committee, the local areas are gaining a better understanding of the services that are offered to students and youth with disabilities through VR and other disability service providers. This has resulted in refined referral processes and opportunities to engage people with disabilities in the SC Works Centers.

**Work-Based Learning.** The state is committed to increasing the use of work-based learning opportunities to expose youth to employment and career opportunities. Increasing the use of work-based learning will help youth acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment.

***3. Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element. [12]***

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[12] Sec. 102(b)(2)(D)(i)(I)

#### **Availability of Program Elements**

South Carolina's 12 LWDA's are responsible for providing or connecting youth to the 14 required elements: (1) Tutoring, Study Skills Training, Instruction and Drop-out Prevention Services; (2) Alternative Secondary School Services or Dropout Recovery Services; (3) Paid and Unpaid Work Experience; (4) Occupational Skills Training; (5) Education Offered Concurrently with Workforce Preparation and Training for a Specific Occupation; (6) Leadership Development Opportunities; (7) Supportive Services; (8) Adult Mentoring; (9) Follow-up Services; (10) Comprehensive Guidance and Counseling; (11) Financial Literacy Education; (12) Entrepreneurial Skills Training; (13) Services that Provide Labor Market Information; and (14) Postsecondary Preparation and Transition Services. To ensure program participants have access to the 14 elements, programmatic monitors will conduct annual reviews of each local area. Additionally, each local area will be responsible for describing how the elements are integrated within their program design in their local plan.

*4. Provide the language contained in the State policy for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for "requiring additional assistance to complete an education program, or to secure and hold employment" criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.*

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#### **Policy for Requiring Additional Assistance**

The state does not have a policy for "requires additional assistance to complete an educational program." As allowed in 20 CFR § 681.300, South Carolina requires each Local Board to establish definitions and eligibility requirements in written policies when using the "requires additional assistance" criteria for out-of-school youth, as well as in-school youth. The areas are responsible for creating and submitting a policy to the state each program year.

*5. Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define "not attending school" or "attending school," indicate that is the case and provide the state policy for determining whether a youth is attending or not attending school.*

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#### **State Definition for Not Attending/Attending School**

State law does not define "not attending school" or "attending school." However, South Carolina compulsory education laws require children to attend regularly a public or private school or kindergarten which has been approved by the State Board of Education, a member school of the South Carolina Independent Schools' Association, a member school of the South Carolina Association of Christian Schools, or some similar organization, or a parochial, denominational, or church-related school, or other programs which have been approved by the State Board of Education from the school year in which the child is five years of age before September first until the child attains his seventeenth birthday or graduates from high school (SC Code Section 59-65-10).

For purposes of WIOA, as directed in 20 CFR § 681.230, providers of Adult Education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, or dropout re-engagement programs are not considered to be schools. Therefore, in all cases except the one provided below, WIOA youth programs may consider a youth to be an out-of-school youth for purposes of WIOA youth program eligibility if he/she is attending Adult Education provided under Title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding source of those programs. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception; they are considered in-school youth. Students enrolled in any credit-bearing postsecondary education classes are considered to be "attending school" for WIOA eligibility purposes.

*6. If using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.*

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#### **Definition for Basic Skills Deficient**

South Carolina's definition for "Basic Skills Deficient" corresponds with the definition provided in WIOA Sec. 3(5)(A). Youth ages 14-24 are considered basic skills deficient if the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test.

#### **d. Single-area State Requirements**

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

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

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

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

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Not applicable to South Carolina.

*4. A description of the roles and resource contributions of the one-stop partners.*

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Not applicable to South Carolina.

*5. The competitive process used to award the subgrants and contracts for title I activities.*

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Not applicable to South Carolina.

*6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.*

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Not applicable to South Carolina.

*7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.*

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Not applicable to South Carolina.

*8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.*

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Not applicable to South Carolina.

#### e. Waiver Requests (optional)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

*1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;*

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*2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;*

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*3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;*

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*4. Describes how the waiver will align with the Department's policy priorities, such as:*

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- A. Supporting employer engagement;
- B. Connecting education and training strategies;
- C. Supporting work-based learning;
- D. Improving job and career results, and
- E. Other guidance issued by the department.

*5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and*

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*6. Describes the processes used to:*

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- A. Monitor the progress in implementing the waiver;
- B. Provide notice to any local board affected by the waiver;
- C. Provide any local board affected by the waiver an opportunity to comment on the request;
- D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
- E. Collect and report information about waiver outcomes in the State's WIOA Annual Report.

*7. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.*

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The State of South Carolina seeks approval of the following statutory and regulatory waiver in accordance with the Secretary's waiver authority outlined in Section 189(i)(3)(A) of the Workforce Innovation and Opportunity Act(WIOA) and 20 CFR and 679.600. This waiver request will assist South Carolina to further develop its workforce while continuing to focus on innovative strategies for a demand-driven workforce.

**Waiver from the Eligible Training Provider data collection and reporting requirements**

South Carolina is seeking a waiver from the requirements outlined in the WIOA at Sections 116 and 122, and at 20 CFR 677.230 and 20 CFR 680.400 thru 680.530, which require the collection and reporting of performance related data on all students participating in training programs listed on the state's Eligible Training Provider List (ETPL).

**Actions Taken To Remove Barriers**

Subsequent to the passage of WIOA in 2014, South Carolina has been working diligently to implement the law's Eligible Training Provider (ETP) provisions. Under the leadership of the State Workforce Development Board, a workgroup of state and local workforce and educational stakeholders developed and deployed guidelines on the ETPL. In November, 2016, the new ETPL, Palmetto Academic Training hub (PATh) was launched providing an improved and enhanced customer experience compared to the state's previous ETPL. Memoranda of Agreement were issued to all current and new training providers to outline the data collection and submittal requirements.

Beyond the ETPL requirements, South Carolina's workforce development and education partners have been working to create a mechanism for a data warehouse for not only training providers, but all state agencies and other entities to submit and utilize participant data. Through the CCWD (a legislated council whose mission is to catalogue all workforce resources, minimize duplication, and make recommendations to the Legislature on workforce system improvements), a multi-agency data workgroup convened to make recommendations for legislation requiring student and other economic and workforce development data be shared as allowable by governing entities. Draft legislation for a data governance structure for education and workforce development partners has been developed and

approved by the CCWD, which is planned to be introduced in the next SC legislative session. Members of the General Assembly have expressed a desire for a longitudinal data system to aide in workforce development and evidence-based policy making.

The state is working to leverage existing systems to assist with meeting the WIOA ETP performance reporting requirements. Despite these efforts, the state has faced several challenges while working to implement the WIOA ETP requirements, which include:

- Ensuring that local areas have sufficient numbers of, and diversity of, training providers necessary to create an effective marketplace of training programs for WIOA participants utilizing ITAs.
- Ensuring objectivity in the process of determining training provider eligibility.
- Reducing the burden on training providers to submit performance information to the state which may not be readily accessible to the provider.
- Much of the performance information collected by training providers is self-reported through surveys, etc. There is no way to verify the accuracy of self-reported, inconsistently collected performance data.
- Training providers do not currently have a method to match students with data sources to calculate outcomes, so they are required to send student data through PATH to be matched with wage records. This is not only a reporting burden on training providers, but in many cases, sensitive information, including certain personal student data needed for performance reporting, is never collected from students.
- Training providers contend that to collect and submit information on all students is too big a burden. Thus, many providers choose not to be on the ETPL or to severely cut the number of programs. Several public technical colleges have removed credit programs from the ETPL because of the reporting burden. As a result, limiting consumer choice.

To show evidence of impact if the collection and reporting of performance related data on all students participating in training programs is not waived, the Program Year 2019 Memorandum of Agreement (MOA) with providers pertaining to reporting requirements was revised. The revised MOA added language that allowed providers to remain on the ETPL if a demonstrated reporting burden was communicated with the state. South Carolina received certified letters demonstrating a reporting burden from 5 of the 16 technical colleges in the state.

One technical college stated in their submitted letter that, "The number of students in the credit and non-credit programs makes reporting for the 'all students' cohort a burden. For instance, [the technical college] does not have the staff, time, and additional resources to report on all of the 280 Mechatronics [students] in the program to support the data for one WIOA-sponsored student. [The technical college] has previously listed 17 credit programs in the ETPL. In Fall 2018, there were 1049 non-WIOA students and 8 WIOA-sponsored students in those programs. The burden of submitting data for the 1049 students to support 8 WIOA students is not an effective use of the college's resources."

We anticipate that at minimum those 5 technical colleges, who are also local workforce system partners, will either remove themselves from South Carolina's ETPL or fail to submit the required information for the "all student" population if they are required to report on "all student" data.

To date, we have 72 approved providers and 1,206 approved programs on the South Carolina ETPL. Those 5 providers combined have 232 approved programs of training. If those providers decide not to participate in the ETPL due to a documented burden, then there would be roughly a 20 percent reduction in approved programs on South Carolina's ETPL. This reduction would affect consumer choice across the state, but would dramatically affect several rural areas.

**Goals, Outcomes, and Benefits Related to this Waiver Request Include:**

- SC will continue to develop the infrastructure to support a robust ETPL without severely reducing training options during this period of development
- SC will continue to promote training related to the high-growth, high-demand industries through PATH
- More training providers may lead to lower cost and more robust demand-driven training options.
- Greater utilization of the ETPL by individuals pursuing training in South Carolina related to jobs that are in-demand by employers now and in the future.
- Stronger partnerships and relationships between training providers and the public workforce system.
- Time to build on and utilize those stronger relationships to find a data collection and performance solution that is equitable and effective for all partner and provider needs.

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver.

South Carolina has been working towards the public display of ETP performance information. Due to extract specifications in ETA-9171 guidance and concerns of the appropriate display of information, additional questions have been sent to DOL for clarification. In addition, with only one year of reported data, South Carolina is choosing to use program years' 2020-2021 ETP performance reporting data in conjunction with program years 2018-2019 to establish a baseline for determining the state's ETP goals. Until a baseline is established and further clarification is provided by DOL regarding reporting specifications, cohorts and time periods, we are unable to set ETP goals.

**Individuals Impacted By the Waiver**

Individuals who will be able to access training services in South Carolina related to high-growth industries while the state develops parameters to share and house participant data.

**Monitoring and Implementation**

Annual WIOA on-site reviews will include an evaluation of how waivers are impacting local programs to ensure programmatic goals and outcomes are being met.

State staff involved with the administration of the ETPL and performance reporting will periodically examine the appropriateness and the effectiveness of this waiver. This strategy ensures that the goals described above are consistent with established objectives of the WIOA and federal and state regulations.

**Annual Report**

It was communicated in the annual report that, in PY'18 further guidance was provided by the Department of Labor (DOL) on the language in the waiver. South Carolina was advised that while a waiver is in place until June 30, 2020, South Carolina must take in to account all student data with regards to continued eligibility. In an effort to demonstrate the burdens imposed on training providers to DOL and mitigate a complete deficit to South Carolina's ETPL, a Memorandum of Agreement (MOA) with providers pertaining to reporting requirements was revised. The revised MOA added language that allowed providers to remain on the ETPL if a demonstrated reporting burden was communicated with the state.

While performance information on all students was strongly encouraged but not required by South Carolina for PY'18, the review of WIOA participant performance data continued. Reports have been utilized and communicated on a consistent basis with Local Workforce Development Areas (LWDAs)

regarding: total number of participants served, total number of participants who received training, median earnings, credential rate, measurable skill gains, employment rate Q2 and Q4 measures.

### Notice to Local Boards and Public Comment

South Carolina's Combined State Plan is subject to the requirements outlined in the WIOA Regulations at 20 CFR 676.143(c)(1) for public review and comment. Any comments received have been attached with the submission of this plan.

### Title I-B Assurances

The State Plan must include assurances that:

THE STATE PLAN MUST INCLUDE	INCLUDE
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

## Adult Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	77.3	77.3	77.8	77.8
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	73.5	73.5	74.0	74.0
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$5,153	\$5,300	\$5,179	\$5,350
CREDENTIAL ATTAINMENT RATE	60.0	60.0	60.5	60.5
MEASURABLE SKILL GAINS	38.5	49.5	39.0	50.5
EFFECTIVENESS IN SERVING EMPLOYERS	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> “Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.

### Dislocated Program Performance Indicators

#### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction

with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	80.6	80.6	81.1	81.1
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	76.5	76.5	77.0	77.0
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$6,725	\$7,300	\$6,759	\$7,300
CREDENTIAL ATTAINMENT RATE	60.0	60.0	60.5	60.5
MEASURABLE SKILL GAINS	31.8	48.0	32.3	48.5
EFFECTIVENESS IN SERVING EMPLOYERS	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

### Youth Program Performance Indicators

#### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline"

indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	77.1	77.1	77.6	77.6
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	69.5	69.5	70.0	70.0
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$3,000	\$3,250	\$3,015	\$3,250
CREDENTIAL ATTAINMENT RATE	68.6	68.6	69.1	69.1
MEASURABLE SKILL GAINS	45.3	48.0	45.8	49.0
EFFECTIVENESS IN SERVING EMPLOYERS	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> “Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.

## Program-Specific Requirements for Wagner-Peyser Program (Employment Services)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

### a. Employment Service Staff

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

South Carolina will continue to use merit staff employees to provide labor exchange services under the Wagner-Peyser Act.

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

**Professional Development Activities for Employment Service Staff**

Staff development is an important component of South Carolina's commitment to deliver high quality and effective workforce services. Employment services staff are trained in job search techniques, accessing labor market information, workshop facilitation, interviewing skills, resume writing certification training, and addressing barriers to employment.

The staff also receives training to work with target populations, including "Building Bridges." Administered by the Bureau of Federal Prisons, this program helps individuals understand and develop skills to work with the ex-offender population. In-depth, on-going customer service training is mandatory for all DEW employees. Additionally, sales training is provided to Employment Service staff to help develop strategies for increasing business penetration.

Employment Services staff also have received training on effective case management, how to record effective case notes, developing individual employment plans, and recruitment best practices. An Employment Services manual was developed in order to compile policies and procedures. Routine trainings are provided to staff on contents of the manual and it is stored on the online system. Rapid Response training was developed and delivered to frontline staff who assist with rapid response services to businesses and jobseekers.

Wagner Peyser staff have attended the National Veterans Training Institute's Advanced Business Service and Advanced Case Management training. These offerings help further develop frontline staff's ability to assist the businesses and citizens of South Carolina. Onsite training and assessment are also provided in person to local staff and management. Regional Managers participate on LWDBs to provide information and are involved in workforce issues on the state and local level.

**3. Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication**

**Strategies to Support Training and Awareness across Core Programs**

DEW shares information and provides technical assistance to staff who serve job seekers and employers. Technical assistance on Unemployment Insurance (UI) issues, questions regarding eligibility, and on the work search test are also provided to SC Works Center staff. Additionally, DEW's website supplies answers to frequently asked questions regarding UI. UI claimants receive information and assistance on the full range of one-stop services offered both online and in person. Rapid Response teams provide services to employers and workers in layoff situations and conduct claim filing activities when needed.

UI programs play a vital role in the integrated workforce system by providing income support benefits to eligible individuals who continue to be important customers of the workforce system. These benefits allow unemployed workers to engage in work search activities for suitable employment, and the workforce system is a key source of services to support the reemployment of UI claimants.

To ensure efficiency, a Workforce Information Portal (WIP) was developed to provide a secure method for partner staff to obtain the necessary UI data that is used to determine an individual's potential eligibility for services and training under WIOA. The WIP also allows staff to communicate potential UI fraud and availability issues in an efficient and streamlined manner.

Sharing such information with UI staff helps to accelerate the claimants' return to suitable employment and ensure their continued eligibility to receive UI benefits.

- b. Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through one-stop centers, as required by WIOA as a career service*

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#### **Provision of Information and Meaningful Assistance**

Access to the online claim filing system is available at every SC Works location across the state. Resource rooms are staffed with individuals who can assist with filing a claim. A toll-free number is also available for individuals with questions specific to their claims. A network of access points has been established statewide for individuals to apply for benefits and perform their work search. Registration in the SC Works Online System (SCWOS) is required for all UI Claimants and two required weekly work searches must be conducted within the system. Access to SCWOS is available at all comprehensive centers and access points. Claim filing guides are available in resource rooms at SC Works locations and employment service staff is available to assist and answer question about the filing process. An Unemployment Insurance 101 training was developed and delivered to SC Works Center staff. The training was also uploaded and stored on the Agency's learning management system and is available for all staff.

- c. Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals*
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#### **Strategy for Providing Reemployment Assistance to UI Claimants**

##### **Universal Access**

Individuals seeking employment and eligible to work in the United States are eligible for Wagner-Peyser services. These services can be provided in person or remotely. Job search assistance, access to labor market information, résumé assistance, workshops, and hiring events are offered in all comprehensive centers.

To identify individuals who are at risk of exhausting benefits, South Carolina requires all UI claimants to register for Employment Services in SCWOS. Individuals attending Worker Profiling and the Re-employment Services and Eligibility Assessment Program (RESEA) are first given information on services provided by the workforce system, and after an initial assessment they are provided with more customized services for their situation. These services could include referrals to employment, referral to partners, participation in workshops, and information on the local labor market, training options, and other services that are available.

##### **Re-Employment Services and Eligibility Assessment Program (RESEA)**

The Re-employment Services and Eligibility Assessment Program (RESEA) is designed to address individual reemployment needs of UI claimants and works to prevent and detect UI improper payments. RESEA serves as a bridge between Unemployment Insurance and Employment Services in the provision of services to ex-Military members (UCX) and lack of work claimants, with the goal of reducing duration and protecting the integrity of the UI Trust Fund. Numerous services are provided through the program to include but not limited to reemployment services, provision of labor market information, one stop orientations, development of employability plans, referrals to training and unemployment compensation eligibility reviews. The RESEA program is operated from all comprehensive SC Works Centers, in coordination with DEW's Unemployment Insurance Division.

*d. Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following:*

**1. Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;**

**Coordination of and Provision of Labor Exchange Services**

All individuals applying for UI benefits are required to register with the state Employment Service by creating an account in SCWOS. This allows individuals to search for jobs, job referrals, create a resume, set up job matching criteria, develop an employment plan, take self-assessments and search labor market information. SC Works Centers have resource rooms that support these services, and staff is available to assist. As a result of aligning services, individuals with barriers to employment are provided staff assisted services. Additionally, referrals to partner and community service providers are available along with information on Federal Bonding.

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

**Registration of UI Claimants**

As stated previously, South Carolina law requires UI claimants to register in SCWOS and perform two work searches per week using the system. Wagner-Peyser staff is available to assist individuals with the registration process and the weekly work search if assistance is needed. Workshops on various reemployment topics are also offered at SC Works centers, and anyone interested is able to attend.

**3. Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and**

**Administration of Work Test for State Unemployment Compensation System**

In order to receive and maintain benefits in South Carolina, individuals must register in the SC Works Online System (SCWOS). Individuals must also be able, available, and actively seeking work. Claimants are required to perform two work searches per week in SCWOS. If an individual fails to perform a search or declines a request for an interview with a prospective employer, an issue can be placed on the claim for further clarification.

Job finding and placement services are offered both remotely and in person. To facilitate these services, each comprehensive SC Works location has staff available to assist individuals looking for employment. Employment Services staff post available positions for employers and help individuals match their skills with available positions for which they qualify, including UI claimants. SCWOS also spiders in jobs posted on many other job boards and individual company websites.

**4. Provision of referrals to and application assistance for training and education programs and resources.**

**Referrals and Application Assistance for Training and Education Programs**

Staff in SC Works centers across the state use an initial assessment to determine customers' needs. Based on information received during this process, coupled with an individual's stated goals, a path forward is identified for each customer. This path could include information or workshops offered in centers or at partner locations, or referrals to training programs and other partner or community-based services. In addition, staff may assist customers with training or financial aid applications as needed. Coordination and communication among partners is critical

to the success of each individual in order to provide an array of options that will benefit the customer most.

In order to receive and maintain benefits in South Carolina, individuals must register in the SC Works Online System (SCWOS). Individuals must also be able, available, and actively seeking work. Claimants are required to perform two work searches per week in SCWOS. If an individual fails to perform a search or declines a request for an interview with a prospective employer, an issue can be placed on the claim for further clarification.

Job finding and placement services are offered both remotely and in person. To facilitate these services, each comprehensive SC Works location has staff available to assist individuals looking for employment. Employment Services staff post available positions for employers and help individuals match their skills with available positions for which they qualify, including UI claimants. SCWOS also spiders in jobs posted on many other job boards and individual company websites.

**e. Agricultural Outreach Plan (AOP).** *Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include an assessment of need. An assessment need describes the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.*

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**1. Assessment of Need.** Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

#### **Assessment of Need**

There are several factors that make the needs of the South Carolina's farm worker unique. Although the agricultural industry is a long-established tradition in South Carolina, its workforce has seen dramatic changes in recent years. There continues to be an increase in H-2A workers and this trend is expected to continue.

South Carolina's Migrant and Seasonal Farmworkers (MSFWs) are predominantly from Latin-American countries – having Mexico as the main contributor of workers, but also including individuals from Central America and the Caribbean. Most of them speak Spanish, but we have also detected several indigenous dialects from the south of Mexico and regions of Central America.

Since most of the MSFWs are Latino, one important aspect when analyzing the needs of the farmworker is to consider the Latino community in the state as a whole. The Latino community in South Carolina is growing rapidly. However, this community is still considered an "emergent" community. As a result, this community lacks the resource network that would be easily found in states with a large and well established Latino community such as California, Texas or Florida – or even North Carolina. In those states, farm workers utilize resource networks, usually comprised of Latino community-based and religious-based organizations, to learn about the workforce system and how they can access workforce development services. In our state, this resource network is new and small. Furthermore, sometimes when farmworkers are able to navigate the system, they find that agencies or organizations providing the services lack bilingual/bicultural staff to understand their language and overcome cultural differences. As a

result, we have a community that is at risk of being isolated and unable to access available resources.

In the SC Works Centers throughout the state, bilingual staff members work with MSFWs of limited English proficiency to provide career services. When no qualified and trained bilingual employee is available, DEW will offer and secure, at no cost to the client, a qualified interpreter or translator service. If there is a need for remedial and/or occupational training, the MSFW is generally referred to a local Adult Education office for English as a Second Language and is then referred to a training provider.

Telamon is also a partner of the SC Works Centers and provides additional services to migrant and seasonal farmworkers. In the coming program year, efforts will be made to establish closer cooperation and service collaboration with partners, such the state's NFJP grantee, to ensure greater alignment of career and training services to MSFWs.

In Program Year (PY) 2019, the number of H-2A workers is expected to continue to increase. Overall, the projected agricultural workforce need for South Carolina in PY 2019 is approximately 12,750 workers. This is a small increase in the number of workers that was needed in PY 2018. April through September are the peak harvest months in South Carolina with an estimated 6,125 MSFWs, and low season occurs during October through December with an estimated 1,000 MSFWs. It is anticipated that the number of agricultural job openings received by DEW will remain steady at about 11,000. This total includes approximately 6,300 migrant and seasonal farm workers and 6,270 H-2A. The number of domestic MSFWs in South Carolina is difficult to estimate and could be understated as some of these workers cannot be located.

**Table 1: South Carolina 5 most Labor-Intensive Crops**

CROP	MONTHS OF HEAVY ACTIVITY	GEOGRAPHIC AREA
PEACHES	November – September	Statewide
STRAWBERRIES	March – July, September – October	Statewide
TOBACCO	March – September	Pee Dee, Lower Savannah
TOMATOES	March – September	Coastal
WATERMELONS	March – October	Pee Dee, Lower Savannah

**Table 2: Estimated Number of MSFW and H-2A Workers**

<b>Estimated Number of MSFW and H-2A Workers</b>		
<b>PY 2019</b>		
<b>Area</b>	<b>Estimated MSFWs</b>	<b>Estimated H-2As</b>
Beaufort	1125	1734
Charleston	1150	340
Greenwood	1050	3147
Spartanburg	1200	494
Sumter	1800	555
<b>TOTAL</b>	<b>6325</b>	<b>6270</b>

*A chart showing the Estimated Number of MSFW and H-2A Workers for PY 2019 by area.*

The peach and strawberry industries continue to increase the size of the H-2A worker program. Other specialty crops, as well as nursery and greenhouse work, have also contributed to this increase. These activities are primarily in the Savannah Ridge and Piedmont areas.

**Table 3: South Carolina Top 10 Commodities**

<b>Commodity</b>	<b>South Carolina Top 10 Commodities</b>			
	<b>State receipts (\$1,000)</b>	<b>Percent of State receipts</b>	<b>U.S. receipts (\$1,000)</b>	<b>Percent of U.S. receipts by commodity</b>
Broilers	1,028,768	40.2	1,028,768	3.2
Miscellaneous crops	333,065	13.0	333,065	1.6
Corn	192,864	7.5	192,864	0.4
Cotton lint, Upland	163,020	6.4	163,020	2.4
Cattle and calves	127,993	5.0	127,993	0.2
Chicken eggs	120,549	4.7	120,549	1.1
Soybeans	109,474	4.3	109,474	0.3
Peanuts	89,216	3.5	89,216	5.9
Peaches	72,855	2.8	72,855	14.0
All other animals and products	51,853	2.0	51,853	0.9

*A chart showing South Carolina's top 10 commodities and their state receipts (\$1,000), percent of State receipts, US receipts (\$1,000), and Percent of US receipts by commodity.*

2. An assessment of the agricultural activity in the State means: 1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State

See e.1 above.

3. An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration

See e.1 above.

#### 4. Outreach Activities

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

See e.4.A. below.

##### A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices

###### *MSFW Outreach Activities*

DEW staff conduct outreach activities with agricultural workers through five significant offices: Beaufort, Charleston, Greenwood, Spartanburg, and Sumter. These are located in SC Works Centers. Other public and private community service agencies and migrant and seasonal farmworker groups also provide outreach services. Outreach efforts occur in traditional community settings such as housing facilities, faith-based organizations, health departments and restaurants, community centers, or other areas where MSFWs may congregate.

The farmworkers are contacted at their living, gathering or other assembly areas by outreach workers. An explanation of workforce services available to MSFWs, their rights, including the availability of referrals to agricultural and nonagricultural employment, training, and supportive services, and other job development services is provided in their native language. MSFW outreach workers are required to be bilingual and provide language appropriate services as needed. MSFWs are also provided information about other area organizations available to serve them.

The MSFW Program will continue to establish working relationships with local, regional and statewide agencies to disseminate information regarding the job services provided to MSFWs. Outreach workers are also encouraged to continuously propose new ideas for effective outreach. Resource and information sharing are essential to reach this

goal. MSFW outreach workers are experts in their own regions and are aware of the "best practices" to reach MSFWs who are not being reached by normal intake activities. Quarterly MSFW outreach worker training/meetings provide a standardized framework for continued success and are attended by the State Monitor Advocate.

**B. Providing technical assistance to outreach staff.** Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

*Technical Assistance to Outreach Workers*

Outreach workers participate in the following training sessions:

- SCWOS 101 Training and SCWOS Business Services Training
- MSFW Training- Roles and Responsibilities
- MSFW Complaint Process Training

The State Monitor Advocate (SMA) assists in providing quarterly training for all outreach workers. This quarterly training includes topics inherent to the MSFW program such as: Federal Guidelines and Regulations, Federal LEARS Reporting, Migrant Immigration of Compliance Reports, Outreach Worker Roles and Responsibilities, MSFW Effective Outreach, and Best Practices. The quarterly trainings include information about DEW's job service activities and other workforce development programs. This includes local and regional workforce development and supportive services programs, such as: Migrant Health Services, Migrant Education Program, and other community-based programs. These Quarterly Outreach Worker training/meetings also provide an opportunity for Outreach Workers to better understand the challenges and opportunities that may arise when serving MSFWs.

The SMA works with Employment Services Managers to develop the training agendas. One goal of quarterly training is to ensure that all outreach workers are equally proficient in their position.

**C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues**

*Outreach Worker Training and Awareness across Core Programs*

Outreach Workers are trained on programs along with specialty trainings designed to help them in their specific jobs. Training will be provided in the areas of resume development, customer service, and sales.. Unemployment Insurance training was developed and delivered to all Employment Services staff, to include MSFW Outreach workers, and it is stored on the agency's learning management system. It is available to all staff and new hires. Outreach staff also participate in trainings offered to all SC Works center frontline staff. Professional development opportunities are available for state merit outreach staff such as resume writing certification, career development facilitator certification and other training options.

D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers

*Professional Development for State Merit Staff Outreach Workers*

Professional development opportunities are available for state merit outreach staff such as resume writing certification, career development facilitator certification and other training options.

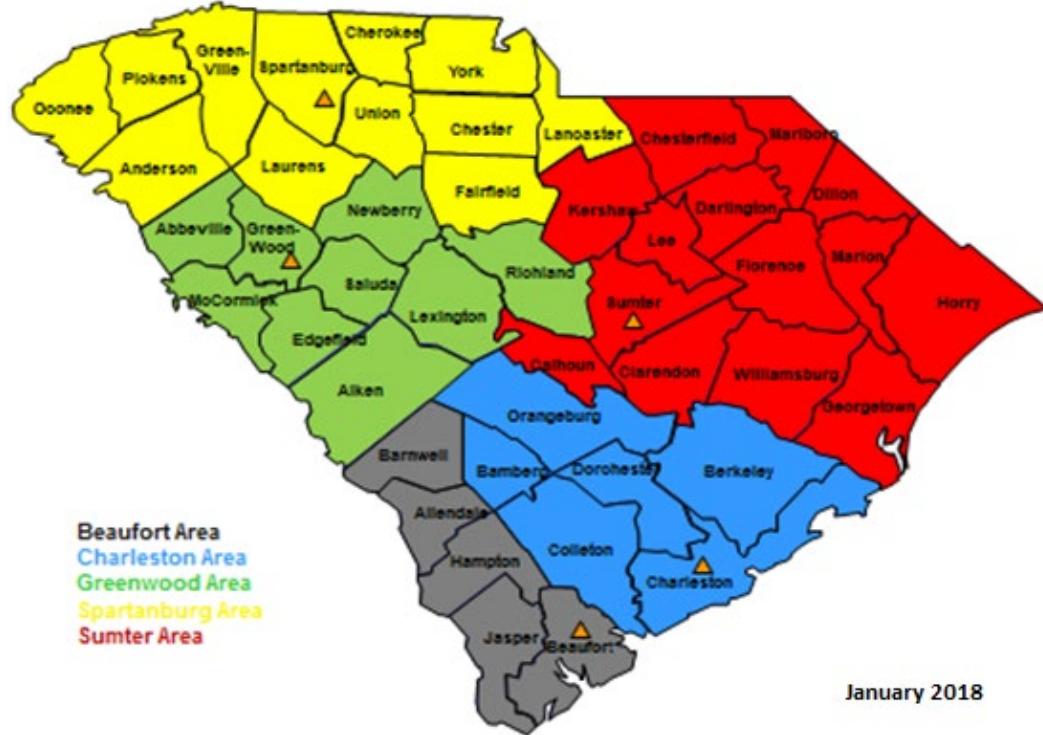
E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups

*Coordinating Outreach with NFJP Grantees*

Coordination with NFJP grantees will take place with outreach workers across the state to provide services. SCDEW outreach staff will coordinate visits with Telamon to locations across the state. The coordination of outreach efforts with the NFJP grantees includes agency field staff working in conjunction with the NFJP regional field representatives in the designated regions.

**Figure 1: MSFW SC Works Five Significant Offices and Coverage Areas**

**MSFW SC Works Five Significant Offices and Coverage Areas**



Vigorous outreach activities will be conducted to ensure that MSFWs are aware of the full range of employment services. DEW outreach workers and Rural Manpower staff will work together to coordinate outreach activities, thus maximizing program effectiveness and efficiency. Statewide, there are five, full-time outreach worker positions dedicated to outreach activities in the Beaufort, Charleston, Greenwood, Spartanburg, and Sumter outreach areas. MSFW outreach staff, as well as Rural Manpower staff, will be primarily supported through Wagner-Peyser funding. Due to

the varying concentrations of MSFWs in the different areas, some movement of outreach workers between areas will be necessary.

DEW partners with other agencies across the state of South Carolina that also target the MSFW population, including the WIOA Section 443 National Farmworker Jobs Program (NFJP) Grantee-Telamon Corporation, SC Legal Services, SC Department of Education Migrant Education Program, SCPHCA-Migrant Health Program, East Coast Migrant Head Start Program, and faith-based migrant community organizations and associations.

In addition, staff will continue to foster cooperation with other governmental and community-based organizations in providing information and promoting the MSFW program at appropriate meetings and through other avenues. For example, the State Monitor Advocate (SMA) actively participates in different coalitions and groups across the state to advocate for the MSFW community and forge collaborative partnerships. These groups include the Greenville Hispanic Alliance, Alianza Hispana de Columbia, Spartanburg Hispanic Alliance, Lowcountry Immigration Coalition, Council of Mexicans in the Carolinas and the SC Hispanic Leadership Council, among others. The SMA also maintains contact with community and faith-based organizations, as well as media outlets, healthcare providers, government agencies, and Department of Education representatives.

The SMA acted as a Member of the Advisory Council of the Institute of Mexicans Abroad. This institute is part of the Secretary of Foreign Affairs of Mexico. As part of this group, the SMA worked closely with the Mexican Consulate in Raleigh, N.C. which is entrusted with providing services to people of Mexican origin in the states of South Carolina and North Carolina. The SMA's strategic goal is to develop a statewide effort to enhance the quality of life and quantity of services delivered to the MSFW community in South Carolina through the sharing of useful information and timely exchange of ideas.

Additionally, DEW conducts annual farmer meetings regionally to allow organizations that work with the MSFW population an opportunity to inform farmers of the many services and benefits available to their workers.

DEW will comply with CFR 20 653.107, Sub-part B, in delivering services to MSFWs. The roles and responsibilities of the outreach worker include:

- Contact and locate the MSFWs where they work, live or gather
- Observe the work and living conditions
- Explain the services available and other organizations serving MSFWs
- Provide information about the job service complaint system and assist in the preparation of a worker complaint
- Explain basic farm worker rights when the outreach worker refers an MSFW to a job (20 CFR 653 and 658)
- Refer to job openings and assist in the preparation of a work application
- Refer to supportive services, if needed
- Assist in making appointments, preparation of applications for employment services, and arranging transportation to and from local workforce centers
- Maintain complete records of contacts with MSFWs and services performed

An explanation of workforce services available to MSFWs, including the availability of referrals to agricultural and nonagricultural employment, training, and supportive services, and other job development services will be provided in a language readily understood by the farmworker. MSFW outreach workers are required to be bilingual and provide language appropriate services as needed. MSFWs will also be provided with information about other area organizations available to serve them.

Each outreach worker will maintain a log of daily contacts which will include the number of MSFWs contacted and details of the assistance provided. The name of the individual contacted will be recorded in all cases where an application for work is taken, a referral to a job is made, and/or a complaint is filed. Detailed reports relative to the number of MSFWs, their office of registration, and services provided can be retrieved through the reporting module in SC Works Online Services (SCWOS), the data management, service delivery system for WIOA, Wagner-Peyser, and Trade Adjustment Assistance. The "Notice to Job Seekers" which lists the services available through the SC Works Centers and the toll-free farmworker helpline flyers will be distributed to all MSFWs contacted.

Outreach workers will be familiar with working and living conditions of the migrant and seasonal farm workers. If they observe, have reason to believe, or are in receipt of information regarding a suspected violation of employment related laws or employment service regulations by an employer, the outreach worker shall document the suspected violation and provide the information to the SC Works Center Employment Services Management staff. They will provide assistance in the preparation of job service and non-job service complaints. Complaints will be recorded using the Employment Services Complaint Log and resolved using the Employment Services Complaint System.

## 5. Services provided to farmworkers and agricultural employers through the one-stop delivery system

Describe the State agency's proposed strategies for:

A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

*i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers*

*ii. How the State serves agricultural employers and how it intends to improve such services*

### Services Provided to Farmworkers and Agricultural Employers

DEW's outreach program will focus on increasing MSFWs' ability to access career and training services through SC Works Centers. Outreach workers will inform MSFWs of and refer them to verified employment opportunities and the Employment Services Complaint System. Outreach workers will encourage the MSFWs to utilize the SC Works Centers to obtain the full range of career services; however, on-site assistance will also be offered in the preparation of ES or employment related law complaints, obtaining referrals for employment opportunities, and preparation of employment applications.

Outreach workers will refer individual MSFWs, or family members, who may be eligible, to WIOA and supportive services and, as needed, will provide assistance in making appointments. MSFWs also will be shown how to use SC Works Online Services

(SCWOS), an Internet-based workforce data management and service delivery system. Through SCWOS, MSFWs can establish a Wagner-Peyser application and apply for jobs.

In the SC Works Centers throughout the state, bilingual staff members work with MSFWs of limited English proficiency to provide career services. When no qualified and trained bilingual employee is available, DEW will offer and secure, at no cost to the client, a qualified interpreter or translator service. If there is a need for remedial and/or occupational training, the limited English proficiency MSFW is generally referred to a local Adult Education office, first, for an "English as a Second Language" course, then is referred to a training provider. Telamon is also a partner of the SC Works Centers and provides additional services to migrants and seasonal farm workers. In the coming program year, efforts will be initiated to establish closer cooperation and service collaboration with partners to ensure greater alignment of services to MSFWs.

Extensive outreach to agricultural employers is an on-going process. This is critical to maintaining interpersonal contact with the employers. Employers are contacted by Rural Manpower coordinators operating out of three SC Works Centers strategically located throughout the state. The map below reflects the statewide coverage provided by Rural Manpower staff through a lead coordinator and support staff.

**Figure 2: Rural Manpower Staff Coverage**

**Rural Manpower Staff Coverage**



March 2014

Examples of services provided to agricultural employers by DEW staff include:

- Local, regional and national recruitment assistance
- Screening job applicants

- Provision of information such as crop conditions, labor supply, and labor market information
- Connection and coordination of services with government and community agencies
- Technical assistance with foreign labor certification
- Soliciting and filling job orders
- Disseminating information on farm-related rules and regulations
- Registering of farm labor contractors
- Providing consultant inspections of migrant housing
- Offering assistance to farmers in obtaining supplies for migrants
- Referring complaints to proper enforcement agencies
- Assisting employers in obtaining work-related posters and notices
- Participating in agricultural related meetings and notifying farmers of these meetings

Many contacts with agricultural employers are made as a result of referrals from other agencies such as the SC Department of Agriculture and Clemson University as well as by word-of-mouth from other workers or farmers.

DEW periodically hosts grower meetings to inform agricultural employers of services available through the state workforce system. Intensive efforts will be made in the upcoming year to increase the market penetration of agricultural employers.

The most basic service provided to agricultural employers is the filling of job openings. Job orders from agricultural employers are entered in SCWOS and qualified candidates are referred. All H-2A order users are mandated to take all qualified United States referrals through the workforce system. Rural Manpower, in particular, strives to refer local applicants to all H-2A orders through community contacts and referrals. In addition, training has been provided to SC Works Center staff throughout the state to encourage local domestic US workers to apply for H-2A jobs.

Other services include the certification and renewals of certification for farm labor contractors and housing inspections of both H-2A and MSFW camps. The Rural Manpower coordinators also perform field checks and communicate with the Chicago National Processing Center in addressing matters relative to any H-2A deficiencies. They also provide critical coordination services by moving MSFW crews to the growers at the appropriate times.

The Employment Services staff will strive to meet and exceed federal program requirements with respect to equity and minimum service level indicators of compliance.

#### **B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups**

DEW will market the complaint system to farmer workers utilizing field staff along with a poster explaining the complaint system for posting onsite.

C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

Services available to farmers and farmworkers are available online at [jobs.scworks.org](http://jobs.scworks.org). Information will be shared with farmers and farmworkers and it is also included online at [www.dew.sc.gov](http://www.dew.sc.gov).

## 6. Other Requirements

### A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

#### *Collaborative Agreements with MSFW Service Providers*

DEW partners with several agencies across the state that also serve the MSFW population. Such organizations include the National Farmworker Jobs Program (NFJP) grantee - Telamon Corporation, South Carolina Legal Services, South Carolina Department of Education Migrant Education Program, South Carolina Primary Health Care Association-Migrant Health Program, East Coast Migrant Head Start Program, and faith-based migrant community organizations and associations.

In addition, staff continues to foster collaborative partnerships with other governmental and community-based organizations in providing information and promoting the MSFW program at appropriate meetings and through other outreach efforts. For example, DEW conducts annual farmer meetings regionally to allow organizations that work with the MSFW population an opportunity to inform farmers of the many services and benefits available to farmworkers. In addition, Outreach Workers are encouraged to participate in local boards/meetings and become part of efforts to increase the quantity and quality of services delivered to the MSFW community. The SMA monitors and evaluates the Outreach Workers' collaborative efforts and their participation in local board/groups that are inherent stakeholders of the MSFW community.

The MSFW Program has become part of the organizing committee for the South Carolina Farm Worker Institute. This institute is a networking and learning opportunity for agencies, organizations, and community leaders working with farm workers across the state.

The State Monitor Advocate has established an ongoing effort to foster shared communications and promote a statewide collaboration to enhance quantity of services delivered to the MSFW community through the sharing of useful information and timely exchange of ideas.

### B. Review and Public Comment

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have

been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

***Review and Public Comment***

Telamon, the SC Agricultural Worker Health Program, and the SC Department of Education Migrant Education Program were emailed a draft of the AOP on January 31, 2020 for review and comment. No comments were received.

**C. Data Assessment**

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

***Data Assessment***

Statewide assessments have shown an opportunity to increase services directly provided to migrants. The State has had success in referrals to employment, referrals to supportive services, job development, referral to staff assisted services, and job placement. For the four preceding program years, the State met all of its Equity Ratio Indicators except two in PY 2015: Job Development Contact and Career Guidance. However, the state has met all of its Minimum Service Level Indicators in PYs 2016, 2017, and 2018. Collaborative efforts to provide services to MSFWs as well as improve the tracking system for services provided will continue. DEW is establishing activities to increase the number of MSFWs registered in SCWOS and focusing our efforts on increasing the number of services delivered to MSFW. We are working with local employers and workforce development initiatives to capture current and reliable information regarding all placements of MSFW.

**D. Assessment of Progress**

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

***Assessment of Progress***

Staff has continued to build working relationships in their region with entities to help serve migrant workers. All outreach staff are now bilingual and have more access to the farm community. The state plans to continue to look for effective ways to serve the migrant and farm communities. The state met all performance indicators for PYs 2016-2018.

**E. State Monitor Advocate**

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

South Carolina's State Monitor Advocate (SMA) has reviewed and approved the Agricultural Outreach Plan.

## ***Wagner-Peyser Assurances***

The State Plan must include assurances that:

<b>THE STATE PLAN MUST INCLUDE</b>	<b>INCLUDE</b>
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: <ol style="list-style-type: none"> <li>1) Initiate the discontinuation of services;</li> <li>2) Make the determination that services need to be discontinued;</li> <li>3) Make the determination to reinstate services after the services have been discontinued;</li> <li>4) Approve corrective action plans;</li> <li>5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;</li> <li>6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and</li> <li>7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.</li> </ol>	Yes

## ***Wagner Peyser Program Performance Indicators***

### **Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators

were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	68.5	68.0	68.5	68.5
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	67.5	67.5	68.0	68.0
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$4,515	\$4,700	\$4,538	\$4,750
CREDENTIAL ATTAINMENT RATE	Not Applicable	Not Applicable	Not Applicable	Not Applicable
MEASURABLE SKILL GAINS	Not Applicable	Not Applicable	Not Applicable	Not Applicable
EFFECTIVENESS IN SERVING EMPLOYERS	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

## Program-specific Requirements for Adult Education and Family Literacy Act Programs

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

### a. Aligning of Content Standards

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The South Carolina Adult Education Curriculum Framework was developed to assist local programs with aligning their curriculum to the South Carolina College- and Career-Ready Standards (SCCCR) and the College and Career Readiness Standards (CCR) for Adult Education. The Curriculum Framework aligns the SCCR Standards and the CCR Standards for English-Language Arts (Reading, Language, and Writing) and Mathematics with the current adult skills and literacy assessments used in South Carolina and the standards and academic requirements for enrollment in non-remedial, for-credit courses in postsecondary educational institutions. The Curriculum Framework is organized by Educational Functioning Level (EFL) and identifies the skills and standards in which students need to demonstrate proficiency in order to complete each level.

Local adult education programs follow the standards-based classroom model of instruction to provide a personalized learning environment to empower students and help them achieve their academic and personal

goals. Instructors use diagnostic tools and assessments to determine Educational Functional Levels (EFL) to identify the needs of their individual learners and use these diagnostics to develop individual curricula for each student that includes the knowledge and skills needed to achieve a Measurable Skill Gain and to be prepared for entry into postsecondary education, training, or the workforce.

Ongoing professional development and training opportunities in designing and implementing standards- and research-based instruction for reading, writing, speaking, mathematics are provided at the state, regional, and local program levels throughout the year.

## b. Local Activities

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

### *Adult Education and Literacy Activities (Section 203 of WIOA)*

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
  1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
  2. Is for the purpose of educational and career advancement.

**Special Rule.** Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

South Carolina Department of Education serves as the administrative/fiscal agent for Title II Adult Education and Family Literacy Act (AEFLA). As administrative/fiscal agent, SCDE will solicit service providers to provide services to eligible individuals who: (a) have attained 16 years of age; (b) are not enrolled or required to be enrolled in secondary school under the SC Compulsory School law; and (c) are basic skills deficient; (d) do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or (e) are English language learners.

All activities funded under WIOA are authorized, approved and overseen by the South Carolina Department of Education, Office of Adult Education.

The following organizations are eligible to apply to the South Carolina Department of Education, Office of Adult Education for federal funds provided they have demonstrated effectiveness in providing adult education and literacy services:

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

An eligible provider must show demonstrated effectiveness in providing adult education and literacy activities by submitting:

- a. Performance Record—a minimum of two consecutive years of performance data (within the previous five years) on improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of Reading, Writing, Mathematics, and English language acquisition.
- b. Participant Outcomes— a minimum of two consecutive years of data and/or information (within the previous five years) on outcomes for participants related to Employment, Attainment of secondary school diploma or its recognized equivalent, and Transition to postsecondary education and training.

By federal law, providers are prohibited from using federal funds to supplant state or local dollars. All federal funding will be used to enhance learner services, as outlined in this Plan. South Carolina Department of Education, Office of Adult Education, will conduct competitions under WIOA upon receiving guidance from the US Department of Education, Office of Career, Technical, and Adult Education.

Awards to eligible providers will be made through the Request for Proposal (RFP) applications process. To help ensure direct and equitable access to funds for adult literacy and basic skills activities, RFPs will be announced directly to providers and through multiple media outlets. In addition, all providers will be considered for grants based on the same criteria. These criteria are aligned with the directions contained in this Plan and the thirteen considerations required by federal legislation. After the initial three-year grant, all grants will be awarded on a four-year basis. Future efforts will be made to assess what support eligible providers might need in order to implement this Plan and broaden the discussion of how these needs can be met. South Carolina Department of Education, Office of Adult Education, will use the following process to distribute funds to approved applicants:

Not less than 82.5 percent of the grant funds to award grants and contacts under section 231. Local assistance grants will be distributed based on the ability to meet the requirements of AEFLA Purposes outlined in WIOA: (1) Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency; (2) Assist adults who are parents or family members to

obtain the education and skills that (a) are necessary to becoming full partner in the education development of their children and (b) Lead to sustainable improvements in the economic opportunities for their family; (3) Assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training including through career pathways; (4) Assist immigrants and other individuals who are English language learners in (a) improving their reading, writing, math, speaking, and comprehension skills in English and mathematics skills, and (b) acquiring an understanding of the American system of government, individual freedom, and the responsibilities of citizenship.

**Allowable Costs:** All allowable costs for the federally funded Adult Basic Education program are defined in the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards subpart E (2 CFR Part 200). This will be the document of determination for reasonableness, allowability, and allocability of costs. All costs must be supported by source documentation including cancelled checks, paid bills, payrolls, time and attendance records, purchase orders and signed copies of sub-grant award documents. South Carolina purchasing, and procurement laws must be followed by South Carolina School Districts or other state agencies in the acquisition of all goods associated with the sub-grant. The scope of Adult Education services covers South Carolina's 79 school districts. Adult education provides flexible scheduling to accommodate student needs. Programs are organized to meet the literacy needs of local populations across the state.

As the eligible agency to receive AEFLA funds, in accordance with WIOA Title II (Sec. 231), we will require that each eligible provider use the grant to establish or operate one or more programs that provide services or instruction in one or more of the following categories:

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

South Carolina requires that all sub-grantees for the Adult Education Grant to provide adult education, literacy, workplace adult education and literacy, and workforce preparation. These same sub-grantees must also develop integrated education and training processes that are based on employment need for the state, or for specific employers.

WIOA Title II (Sec. 231) defines Adult Education as academic instruction and education services below the postsecondary level that increase an individual's ability to: a) read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; b) transition to postsecondary education and training; and c) obtain employment

Local adult education programs offer the following Adult Education and Literacy Activities:

### **Adult Education**

#### **Adult Basic Education Program**

Adult Basic Education instruction is designed for an adult who lacks competence in reading, writing, speaking, problem solving, or computation at a level necessary to function in society, on a job, or in a family.

### Adult Secondary Education

Adult Secondary instruction is designed for adults who have some literacy skills and can function in everyday life but do not have an equivalent to a secondary school diploma.

### Literacy Activities

This is a program designed to teach an individual to read, write, and speak in English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

### Workplace Adult Education and Literacy Activity

Local eligible providers offer these services for the purpose of improving the productivity of the workforce in their area through raising the basic skills level. Employers work with our programs and some sponsor classes at their worksites while others send them to regular adult education classes. This further allows us to provide adult education activities concurrently and contextually with any workforce preparation activities and workforce training for either a specific occupation or cluster.

### Generational Family Services

Generational Family Services include Family Literacy Activities, Early Care and Education Career Pathways (ECE Career Pathway), and childcare. Parent centered initiatives offered through Generational Family Services can serve as a gateway to increased involvement in children's education and literacy activities and to careers centered on early care and education. The ECE Career Pathway, is designed to change the economic outlook for the family and is the culminating activity for family literacy participants and the initiative that can lead to economic self-sufficiency.

### Family Literacy Activities

Family Literacy programs address the literacy strengths and needs of the family while promoting adults' involvement in children's education and their own education. Programs provide both parent-initiated and child-initiated activities to support development of those relationships and to increase the motivation to learn for both parent and child. Family literacy programs provide services that are of sufficient intensity in terms of hours, and of sufficient duration, to make sustainable changes in a family and that integrate all of the following activities:

- Interactive Literacy Activities between parents and their children (Interactive Literacy)
- Education for Parents (Parent Education) in facilitating children's learning and becoming full partners in their education
- Parent literacy training (Adult Education) that leads to economic self-sufficiency and meets adults' stated goals
- Age-appropriate education (Early Care and Education) to prepare children for success in school and life experiences

### English Language Acquisition

English Language Acquisition programs assist English language learners in: a) improving their: i. reading, writing, speaking, and comprehension skills in English and ii. mathematics skills; and b) acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship.

An English language learner is an individual who has limited ability in reading, writing, speaking, or comprehending the English language. These individuals' native language is a language other than English and usually lives in a family or community environment where a language other than English is the dominant language.

### Integrated English Literacy and Civics Education (IEL/CE)

IEL/CE instruction is a program or class which focuses on enabling English language learners to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. This includes instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, which may include workforce training.

### Workforce Preparation Activities

The term workforce preparation activities means activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

### Integrated Education and Training (IET)

The term 'Integrated Education and Training' means a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

## c. Corrections Education and other Education of Institutionalized Individuals

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Section 225(a) of the Act states "from funds made available under Section 222(a)(1) for a fiscal year, each eligible agency shall carry out corrections education or education for other institutionalized individuals. The funds described in subsection (a) shall be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including programs for (1) adult education and literacy services, (2) special education, as determined by the eligible agency; (3) secondary school credit; and (4) integrated education and training; (5) career pathways; (6) concurrent enrollment; (7) peer tutoring; and (8) transition to re-entry initiatives and other post-release services with the goal of reducing recidivism. Corrections Education Program Requirements: In accordance with the WIOA Title II, Section 225(b), funds under this program are to be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including academic programs for:

1. adult education and literacy activities;
2. special education, as determined by the eligible agency;
3. secondary school credit;
4. integrated education and training (IET);
5. career pathways;
6. concurrent enrollment;
7. peer tutoring; and
8. transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

The South Carolina Department of Education - Office of Adult Education reserves up to 20 percent of its federal grant received under the Act to provide the required services.

Corrections education sub-grantees must provide adult education and literacy, career pathways, and concurrent enrollment. Sub-grantees have the option of providing additional academic programs (items 2, 3, 7, and 8 above). If selecting to provide item 3, secondary school credit, the SCDE Office of Adult Education only permits high school equivalency diploma preparation.

The South Carolina Department of Education - OAE and each eligible agency that is using assistance provided under Section 225 of the Act to carry out a program for criminal offenders in a correctional institution, shall give priority to serving individuals who will be released within a period of five (5) years.

#### **d. Integrated English Literacy and Civics Education Program**

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

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

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

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

The Integrated English Literacy and Civics Education program is funded under WIOA Section 243 funds. Programs have been established in each of the 12 local workforce areas. These funds are utilized to assist students in improving their English language proficiency as well as offering opportunities for eligible individuals to prepare for and participate in post-secondary education or workforce training concurrently with adult education activities. The skills to be attained assist students in obtaining citizenship, achieve basic life skills needed, enhance employment, function in English at a higher cognitive level, and transition into a vocational or academic program.

Providers receiving funds under the IEL/CE program will be required to offer high quality English language acquisition activities, while integrating workforce preparation skills. These programs are also required to implement an Integrated Education and Training (IET) program with eligible students. IET is a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational

and career advancement. IET programs directly align with employment needs as identified by each of the Local Workforce Development areas. These IET programs are developed directly with core partners and employers to place students in unsubsidized employment, in in-demand industries, and occupations that lead to economic self-sufficiency. IEL/CE grant recipients are required to identify eligible students, including professionals with degrees and credentials in their native countries, for participation in the IET program. Each IEL/CE program has designated staff to provide English language instruction and college and career navigation services to enrolled students. These staff members are integral to moving students toward post-secondary education and training and subsequent gainful employment to address local employment needs.

The South Carolina Office of Adult Education will be responsible for monitoring programs for compliance with WIOA Title II, Section 243 and providing technical assistance to programs participating in the IEL/CE program.

## e. State Leadership

### 1. *Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA*

The Integrated English Literacy and Civics Education program grant funds are distributed through a statewide competition and allocated based on a combination of formula and performance factors. Funds are used to provide services to English language learners who are adults, including professionals with degrees and credentials in their native countries, to enable such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Approximately 12 providers in South Carolina are awarded funds to be used to deliver English language acquisition activities integrated with workforce preparation activities. Programs receiving IEL/CE funds are required to partner with other entities to allow eligible students to participate in an IET, which combines adult education and literacy activities concurrently with workforce training or postsecondary education.

#### Alignment of Adult Education and Literacy Activities

The South Carolina Department of Education's (SCDE) Office of Adult Education (OAE) has worked diligently and collaboratively to align adult education and literacy activities with core and required one-stop partners. During PY 2018, the OAE, along with core partners and other state agencies, will continue to make revisions to the Unified State Plan as requested by our federal program offices.

Strategic goals for the workforce development system in South Carolina, as indicated in the Unified State Plan, include the following:

- Strengthen the Workforce Pipeline
  - Facilitation of middle skills and middle wage attainment;
  - Creation of education and career pathways;
  - Development of one, consistently delivered soft skills competency-based curricula;
  - Enhancement of school-to-work transition and youth-focused programs; and
  - Facilitation of Middle Skills and Middle Wage Attainment.
- Align the State's Current Public Workforce Development Resources to Ensure a Customer-Centered Delivery System
  - Coordinate Agency Business Engagement Activity;
  - Build and Use Data Driven Decision Making and Evaluation Methods;
  - Expand Specific Partnerships and Collaboration; and

- Coordinate business engagement activity.

The Office of Adult Education is intricately involved with state-level partners in achieving the strategic workforce goals. OAE staff is a part of various workgroups that have been formed to carry out the workforce goals. The workgroups consist of all core partners and other state level partners.

Core partners have worked together to identify ways to improve customer service amongst all workforce partner staff. A statewide plan for training frontline staff has been developed to ensure all partners in the SC Works Centers and workforce system have the knowledge and understanding of each program to guarantee all customers get the services they most need. The frontline staff training will facilitate tailored, effective and streamlined customer service. Core partners planned the training and pooled resources and talents for the most effective delivery methods. The web-based training went live in PY 2017 and will be a useful tool for educating and training current staff and will be helpful in onboarding new staff.

Core partners have also outlined a state-level vision for system integration along with an initial timeline. Activities that have occurred or are in process include the following: review of final rules regarding performance and reporting, review of current intake forms/applications, and identification of common elements and referral processes. Long range planning will include a review of system needs and project development in the context of final reporting guidelines and data collection instructions. Each core program is adapting and making changes to data collection and reporting systems to adhere to the final reporting requirements.

Although the WIOA Integration workgroup consisting of state and local level core and partner program representatives has been convened to plan for universal referral and intake, the integrated operating system will be the most difficult to achieve. Each agency already has a system procured and in place that works well for their programs. Adopting an entirely new system to be used by all partners may take many years to facilitate. Instead the group will likely continue to investigate systems that offer the flexibility to use individual systems but share common data elements and reporting through a portal. All options will require a lengthy process, but integration remains a top priority for the state.

The Office of Adult Education continues efforts to develop and be a part of partner efforts to establish career pathways as a means to provide access to employment and training services for individuals in adult education and literacy activities. The Office of Adult Education will continue to provide training to local adult education programs on career pathways. Local programs are monitored on the development of their career pathways, and as a part of the request for proposal/competitive grant award, they will be required to outline or describe their plan for developing a career pathway.

In addition to the aforementioned core partner activities, the Director of the Office of Adult Education serves as a member of the State Workforce Development Board. His participation on the state board further facilitates alignment of adult education and literacy activities with other one-stop required partners.

The Office of Adult Education collaborative effort with the South Carolina Vocational Rehabilitation (VR) Department, a core WIOA partner, continues to be one of our most successful collaborations. Adult education classes are provided at 24 Vocational Rehabilitation Offices around the state. VR clients referred to adult education are assessed with TABE to determine the focus of instruction. Clients who have a Mathematics scale score of 496 or above and a Reading scale score of 501 or above participate in three week class sessions provided in preparation for the Career Readiness Certificate assessments. Remediation is provided for clients who do not meet class entry requirements.

Another successful partnership is with the South Carolina Department of Social Services (SCDSS). SCDSS administers the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E & T) initiative. SNAP recipients gain skills, training, work, or experience that will increase self-sufficiency.

Adult Education has an agreement with DSS to offer adult education services to SNAP recipients to assist with meeting these goals. Emphasis will be placed on attainment of an HSD, HSED and a career readiness certificate.

### High Quality Professional Development

The Office of Adult Education continues its efforts to establish and provide high quality professional development programs to improve the instruction provided pursuant to local activities required under Section 231(b), including instruction incorporating the essential components of reading instruction, instruction related to the specific needs of adult learners, dissemination of information about models and promising practices related to these programs, and teaching strategies to assist volunteers.

For several years, OAE has operated technical assistance centers. The Technical Assistance Network (TAN) training system supports our professional development process. The TAN system serves as an extension of the Office of Adult Education and supplements the services of OAE by providing professional development and technical assistance to help improve the quality and services of adult education programs. Local adult education staff are required and encouraged to participate in trainings offered by the state and in regional trainings offered through their local TAN. Local adult education practitioners are also encouraged to utilize existing professional development resources such as the Literacy Information and Communication System (LINCS) and WorkforceGPS.

Annually, statewide training opportunities are offered during the spring and fall for both paid and volunteer adult education practitioners. These training institutes are used as a platform to inform adult education practitioners of priorities and changes and to educate them on new practices and tools. Professional development has focused on WIOA, standards, career pathways, digital literacy, math and reading instruction, and other topics related to the specific needs of adult learners.

During the summer, graduate level courses are offered as an additional learning opportunity for all adult education practitioners at low to no cost. These professional development courses include training on best practices, instructional resources and WIOA requirements as they relate to adult education. As a result of the modifications, the following four graduate-level courses are offered: Fundamentals of Adult Education: Program Development, Design and Implementation; Blending College and Career Standards with Technology to Expand Adult Education Instruction; Digital Literacy in Adult Education; Teaching English Literacy to Adult Learners; Content Area Reading & Writing for Adult Educators (Satisfies legislative requirements for the Read to Succeed endorsement and Certificate Renewal) Trainings, meetings, and webinars serve as avenues to share information on national and local models and promising practices. Training will continue for local adult education and literacy providers using the many resources available locally, state-wide, and nationally. OAE is working to place a stronger emphasis on ensuring that materials and training will incorporate research-based components.

Participants are surveyed after all workshops, conference presentations, and training webinars to evaluate the activity/event. Survey results are used for continuous improvement purposes and to identify what additional training may be needed. The survey results are also used to improve professional development offerings. In the future, OAE and the TANs plan to implement methods to assess the impact of professional development on student performance.

### Technical Assistance to Funded Eligible Providers

The OAE provides technical assistance to funded providers in many ways. Technical assistance was provided to individual providers or groups of providers either face-to-face, through conference calls, or web meetings. Statewide training sessions and regional meetings were conducted as well. With input from OAE, regional training was also conducted by TANs.

Overall program performance, as well as program performance through each initiative, is measured by the Desktop Monitoring Tool (DMT). Desktop monitoring allows both the state agency and local

programs to understand how local programs are performing throughout the school year. Programs are required to submit this report quarterly. Programs that perform at aggregate averages of less than 65 percent for ABE and/or ESL students enter an ITAP (Intensive Technical Assistance Program) process and will remain in the process until program performance improves to levels equal to or above 65 percent for both ABE and ESL students.

Funds are being utilized for standards development. Led by OAE, a standards workgroup has been developed. The goal of the workgroup is to develop cross-walks between the state adopted standards, the OCTAE standards, GED and TASC standards, Accuplacer standards, and TABE standards. The program goal is for each provider to have at least one classroom that is totally standards-based and improve from that point to cover all academic classes.

### Monitoring and Evaluation of Adult Education Activities

To formally monitor providers, the Office of Adult Education assigns a compliance monitoring Local Program Review team (LPR) to review all school district programs and community-based organizations (CBO) receiving federal funds and/or state aid to support approved adult learning services.

The LPR process is a systemic approach designed to assess the educational opportunities and the effectiveness of adult education programs and services in the school districts and CBO's. One-fourth of the programs are reviewed each year by a team of OAE staff. The other three-fourths of the programs are informally reviewed by desktop monitoring tools and site visits. To be successful, the LPR effort requires continuous follow-up and support activities including professional development and on-site assistance.

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

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OAE has used funds for permissible activities to enhance the quality of programming in the adult education system. The permissible activities that were supported with federal leadership funds included: Technical Assistance Network (TAN) – Funding is used to support the TAN. The TAN, in collaboration with the OAE, develops and provides training to adult education practitioners on various adult education-related practices and models that support program development and instruction. Professional development activities through the TAN focus on career pathways, integrated education and training, and more. Standards – The OAE has been working to develop adult education standards that incorporate the state's K-12 standards and OCTAE standards. Distance Education – The OAE purchases distance education packages for use by local adult education providers. Graduate Level Courses – The OAE uses federal leadership funds to develop and execute graduate level college courses, based on WIOA guidelines, for adult education practitioners. Transition Services – OAE guides implementation of transition services that are provided locally and provides training for the Transition Specialists. IET – OAE has funded the development of a manufacturing career pathway and is currently developing a healthcare career pathway.

Generational Family Services have been incorporated into approximately 47 percent of South Carolina's adult education programs. Through partnerships adult education programs address one of the most prevalent and universal barriers for participation in adult education, "child care" and transportation.

Programs have incorporated family literacy services to enhance adult education program offerings, and address participation barriers while intensifying student academic goals, (high school diploma (HSD), high school equivalency diploma (HSED), career readiness certification, postsecondary education and training, entering/retaining employment, and focusing on career pathways). Participating students select an academic goal and parent education goal(s): (1) Increase involvement in children's education, and (2) Increase involvement in children's literacy activities.

## Generational Family Services (GFS) Program Requirements

The purpose of the AEFLA GFS Program initiatives (Family Literacy and Early Care and Education Career Pathway) are to provide needed support for efforts that will increase student and family commitment in local adult education programs. The intent of GFS is to provide initiatives that interrupt generational poverty and low literacy by equipping adult students who are parents or guardians and their children for lifelong learning and economic stability. GFS will provide adult education students who are parents or guardians of children with opportunities to improve their academic skills and use those skills to enhance the literacy skills of their children.

GFS is an extension of services that may be offered by local adult education programs to remove barriers from an enrolled student who is a parent or guardian and increase their ability to participate fully in adult education programs. Programs may apply for the Adult Education sub-grant funds in order to provide GFS services. GFS program participation will support the interwoven goals of adult education and family literacy for adults to obtain a high school equivalency diploma (HSED), enter employment, retain employment, move into postsecondary education and training, choose a career pathway, and obtain the educational skills necessary to become full partners in the educational development of their children.

Programs must offer services that include the four components of family literacy. The activities must provide a broad array of services for the student to not only gain educational skills and earn a high school credential but also gain the skills to become the primary teacher for their children and prepare both the parent and the child for success in later life. The required four components of the GFS program are listed below. Adult Literacy (i.e., Adult Education (AE)) with the goal of obtaining a high school diploma, high school equivalent diploma, career readiness certificate, career pathway, postsecondary education, or the military. Training for Parents (i.e., Parent Education (PE)), guardians, or family members regarding how to be the primary teacher for their children and full partners in the education of their children. Educational Activities Between Parent and Child (i.e., Interactive Literacy Activities (ILA)) between parents or family members and their children. ILA must be supported by partnerships such as with the local school district, Head Start, Early Head Start, First Steps to School Readiness, Read to Succeed, and private partnerships. Early Childhood Services (i.e., Early Care and Education (ECE)) is an age-appropriate education to prepare children for success in school and life experiences. These services may be supported by partnerships such as the school district, Head Start, Early Head Start, First Steps to School Readiness, Read to Succeed, and private partnerships.

**GFS Eligible Individuals:** Participation in GFS Program initiatives is limited to adults and OSY, age sixteen (16) or older, who are enrolled in an adult education program; or are not enrolled or required to be enrolled in a secondary school under state law; or do not have a high school diploma or equivalent; and are basic skills deficient; or do not have a secondary school diploma or equivalent, and have not achieved an equivalent level of education; or are English language learners; and have a child(ren) ages birth (0) to eight (8) years, per South Carolina's requirement. This includes being a legal guardian, grandparent, stepparent, aunt, uncle, sibling, or other person with whom the child lives or who has been designated by a parent, legal guardian, or court to act in place of the parent.

### f. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

The Office of Adult Education will use a variety of methods to assess the quality of providers of adult education and literacy activities including:

1.
  - a. Quarterly reporting via the desktop monitoring tool (DMT)

## VI. PROGRAM-

On a quarterly basis, local programs produce a data report that compares each program's outcomes to the negotiated performance targets and to the prior year's performance.

1.
  - a. Analysis of statewide and individual providers' performance and supportive services data to determine professional development focus areas
    - i. Federal grants
      1. Bi-annual reporting
        - a. Interim and final annual reports include information describing the program's strengths, challenges, and quality of processes as well as fiscal, programmatic and performance data.
      - ii. Subject Area and Educational Functioning Levels
        1. Analyze program performance data such as educational functioning level gains (TABE 11 & 12, Best Plus, Best Literacy) and high school equivalency test scores by subject areas to determine topics for instructional professional development.
      - iii. Career Navigator Annual Report (CNAR)
        1. A monitoring tool that is used to collect data on assistance provided to students in the career planning process and the transition from adult education into employment and/or postsecondary education and training programs.
          - a. education services
          - b. employment services
          - c. armed forces services
          - d. supportive services
        2. Allows the South Carolina Department of Education - Office of Adult Education to view specific career services that indicate student progression towards the following WIOA performance measures:
          - a. Employment in the 2nd quarter after exiting the program
          - b. Employment in the 4th quarter after exiting the program
          - c. Credential attainment
            - i. Attainment of secondary school credential **and**
            - ii. Employment and/or enrollment in postsecondary education or training within the program year or within one year after exit from the adult education program.
        3. Used to support the provision of technical assistance toward the WIOA performance measures, to identify emerging and best practices, and as a part of the Compliance Monitoring process for local programs.
  1.
    - a. Intensive Technical Assistance Program (ITAP)

## VI. PROGRAM-

Technical assistance processes have been developed for programs not reaching performance and/or programmatic thresholds for each of the following activities: Adult Education, Corrections Education, English as a Second Language and Generational Family Services. Programs are required to participate in the Intensive Technical Assistance Program (ITAP) status based on the following criteria:

1.
  - a.
    - i. Adult Basic Education (ABE) program performance aggregate average is less than 65%,
    - ii. English as a Second Language (ESL) program performance aggregate average is less than 65%,
    - iii. Overall program attendance - more than 50% of student participants had less than 30 hours of instruction
    - iv. Criteria for Corrections Education and Generational Family Services will vary based on required program components.

The Office of Adult Education (OAE) works with each identified program to strengthen areas of need through individualized Corrective Action Plans (CAPs). CAPs are developed by each identified program and includes incremental goals, strategies and success criteria. Technical assistance is tailored to focus on specific strategies for developing systems to reorganize practices that will impact program administration, staff development, data collection and analysis, the orientation and intake process, student exit and follow-up, standardized assessment, student and program records, and identified instructional areas. All sessions focus on variables that directly and indirectly affect program performance.

1. Compliance Monitoring (CM)
  - a. Formal on-site monitoring visits are conducted to assess programs' delivery of services, performance and compliance with state and federal regulations
    - i. Assigned CM team conducts formal monitoring of all AE programs on a four-year cycle
    - ii. Formal written documentation is submitted by programs documenting program activities and compliance with federal and state regulations and policies
    - iii. On site visit activities include
      1. Review of written documentation
      2. Conducting interviews with program faculty and staff
      3. Observations of program operations and classroom instruction
      4. Financial and program inventory monitoring
    - iv. After completion of the formal Compliance Monitoring visit, a Final CM Report is sent to the Superintendent, Board Chair, and Program Director
    - v. Local program is required to respond to the Final CM Report, if there are any required actions.
    - vi. Deficiencies noted during monitoring are addressed with an individualized Corrective Action Plan
  - b. Virtual monitoring process will be developed and implemented
  - c. Informal monitoring (on-site and virtual) will continue to be conducted on an as-needed basis as a result of program data analysis.

2. Staff surveys and interviews will continue to be conducted to evaluate local professional development opportunities and to determine individual professional development needs including:
  - a. Web-based surveys sent to all program staff prior to bi-annual statewide training conferences.
  - b. Web-based surveys sent to all program staff prior to on-site compliance monitoring.
  - c. Faculty and staff interviews conducted with program staff during formal on-site compliance monitoring.
3. Attendee surveys following all state-provided professional development and training activities to determine level of effectiveness, relevance, and in order to plan future offerings.
4. Student surveys to assess the quality and effectiveness of providers' adult education and literacy activities.

### ***Adult Education and Family Literacy Act Program Certifications***

States must provide written and signed certifications that:

<b>THE STATE PLAN MUST INCLUDE</b>	<b>INCLUDE</b>
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

### ***Adult Education and Family Literacy Act Program Assurances***

The State Plan must include assurances that:

<b>THE STATE PLAN MUST INCLUDE</b>	<b>INCLUDE</b>
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes

**THE STATE PLAN MUST INCLUDE****INCLUDE**

3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

***Authorizing or Certifying Representative*****Certification Regarding Lobbying****Certification for Contracts, Grants, Loans, and Cooperative Agreements**

The undersigned certifies, to the best of his or her knowledge and belief, that:

- 1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- 2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
- 3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Statement for Loan Guarantees and Loan Insurance**

The undersigned states, to the best of his or her knowledge and belief, that:

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If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to [wioa@ed.gov](mailto:wioa@ed.gov) at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
2. Grants.gov - Certification Regarding Lobbying  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

APPLICANT'S ORGANIZATION	ENTER INFORMATION IN THIS COLUMN
APPLICANT'S ORGANIZATION	South Carolina Department of Education
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
FIRST NAME	Michael
LAST NAME	King
TITLE	Director
EMAIL	mrking@ed.sc.gov

### ***Section 427 of the General Education Provisions Act (GEPA)***

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

General Education Provisions Act (GEPA) 427 requirements for Adult Education and Family Literacy Act (AEFLA) funds received by the South Carolina Department of Education (SCDE) - Office of Adult Education (OAE) to provide Adult Education and Literacy Activities are overseen in the following ways:

- In cooperation with SCDE - Office of General Counsel and the SCDE - Office of Special Education Services, OAE delivers training for adult education practitioners serving students with special needs.

- OAE meets regularly with the SCDE - Office of Special Education Services to ensure compliance with all special education regulations.
- OAE requires that all funded local providers have a written plan with local Special Education Departments to transition IEP (Individualized Education Plan) students, and that local providers comply with GEPA which requires each provider to describe the steps they propose to take to ensure equitable access to, and participation in, its federally assisted programs.
- OAE monitors for compliance the written transition IEP as a part of its annual compliance process, and collaborates with the SCDE - Office of Special Education to monitor all other GEPA requirements.

The OAE also ensures that GEPA requirements are met by the State when using federal AEFLA funds for State Leadership and State Administration activities by following the same regulation requirements as subgrantees in the administration of the federal grant, and by ensuring that strong internal controls are in place within the OAE.

### ***Adult Education and Literacy Program Performance Indicators***

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#### **Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);

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

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	30.0	34.6	31.0	34.6
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	30.0	30.0	31.0	31.0

PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATED LEVEL
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$3,000	\$3,000	\$3,100	\$3,100
CREDENTIAL ATTAINMENT RATE	25.0	25.0	26.0	26.0
MEASURABLE SKILL GAINS	44.0	44.4	45.0	45.0
EFFECTIVENESS IN SERVING EMPLOYERS	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

## Program-Specific Requirements for Vocational Rehabilitation (Combined or General)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

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[13] Sec. 102(b)(2)(D)(iii) of WIOA

### a. Input of State Rehabilitation Council

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

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

SCVRD is an independent commission.

2. The designated State unit's response to the Council's input and recommendations; and SCVRD is an independent commission.

3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.

SCVRD is an independent commission.

### b. Request for Waiver of Statewideness

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When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;  
SCVRD has not requested a waiver of statewide.

2. The designated State unit will approve each proposed service before it is put into effect; and

SCVRD has not requested a waiver of statewide.

3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

SCVRD has not requested a waiver of statewide.

**c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System**

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Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

**1. Federal, State, and local agencies and programs;**

In carrying out its mission to prepare and assist eligible individuals to achieve and maintain competitive employment, the South Carolina Vocational Rehabilitation Department (SCVRD) actively seeks referrals and comparable services and benefits. In doing so, the department has established formal and informal partnerships with other providers of facilities and services. For the purpose of referral, service collaboration, facility allocation, and staff designation, cooperative agreements have been established with the following agencies in South Carolina: Department of Mental Health (DMH), the Department of Corrections, the Department of Juvenile Justice (DJJ), the Department of Disabilities and Special Needs (DDSN), the Department of Health and Human Services (DHHS), and the South Carolina Department of Education (SCDE). Detailed agreements between SCVRD and the SCDE describe the coordination of school-to-work transition services and also Adult Education services. With regard to the SC Independent Living Council, the department acts in an advisory and technical support capacity. The SCVRD portion of the Combined State Plan assures that an interagency agreement or similar document for interagency coordination between any appropriate public entities becomes operative. The department has entered into collaborative arrangements with institutions of higher education as well. This is to ensure the provision of vocational rehabilitation services, described in Title IV of WIOA, are included in the Individualized Plan for Employment (IPE) of an eligible individual. This includes the provision of vocational rehabilitation services during pending disputes as described in the interagency agreement or similar document. SCVRD will seek to assure the participation of individuals with physical and mental impairments in training and employment opportunities, as appropriate. With the exception of services specified in paragraph (E) and in paragraphs (1) through (4) and (14) of section 103(a) of the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA) enacted on July 22, 2014, information shall specify policies and procedures for public entities to identify and determine interagency coordination responsibilities of each public entity in order to promote coordination and timely delivery of vocational rehabilitation services.

**2. State programs carried out under section 4 of the Assistive Technology Act of 1998;**

SCVRD works closely with the SC Assistive Technology Program (SCATP) through ongoing communication, cross-participation in staff trainings, and participation in the annual AT Expo. Staff with the SCATP also participates in the Transition Alliance of South Carolina (TASC).

**3. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;**

SCVRD will provide input to the US Department of Agriculture – Office of Rural Development as it endeavors to support the development activities that empower and build capacity of local communities.

**4. Non-educational agencies serving out-of-school youth; and**

SCVRD partners with multiple agencies and entities serving out-of-school youth, to include DJJ (Job Readiness Training and teen centers), Centers for Independent Living, University of South Carolina Center for Disability Resources, SC Developmental Disabilities Council, and Family Connection of SC.

**5. State use contracting programs.**

No State Use Contracting Program is in place in South Carolina.

***d. Coordination with Education Officials***

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Describe:

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

SCVRD considers service provision to high school students with disabilities a priority and collaborates with local and state education agencies to serve them. SCVRD serves students with disabilities who have various pre-employment transition needs in their efforts to prepare for, find, and maintain competitive, integrated employment. SCVRD provides individualized services to students pursuing a high school diploma, a SC High School Credential or Certificate of Attendance to help students successfully enter competitive, integrated employment. This includes making available Pre-Employment Transition Services to all students who are eligible and potentially eligible for VR services.

The State Board of Education statute, 43-243, requires the mandatory participation of representatives of state agencies involved in the financing or delivery of related services to children with disabilities in the state's Advisory Council for Educating Students with Disabilities. The Advisory Council's purpose is to provide recommendations and input on special education and related services for students with disabilities to the Office of Special Education Services.

The age range for Pre-ETS is age 13 to 21, as 13 is the age in which transition services under IDEA begin on a student's IEP in SC. This is agreed upon and aligns with the age range for the SC Commission for the Blind.

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

**A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;**

SCVRD and the SCDE are signatories and partners in a Memorandum of Agreement (MOA), executed on July 7, 2017. This agreement expresses a basic commitment on behalf of both agencies to provide comprehensive vocational and educational services to individuals with disabilities. The agreement details each entity's roles and responsibilities, including financial responsibilities, in identifying and serving students with disabilities. Items covered in the agreement include: student identification and exchange of information, procedures for outreach

to students with disabilities who need transition services, methods for dispute resolution, consultation and technical assistance to assist educational agencies in planning for school-to-work transition activities, and the requirements for regular monitoring of the agreement. Timing of student referrals is individualized based on need but should generally occur no later than the second semester of the year prior to the student's exit from school.

Using the SCVRD-SCDE MOA as a model, SCVRD has developed agreements with all local education agencies in the state. These MOAs clarify roles and responsibilities at the local level. There is an SCVRD counselor assigned to each of the high schools in the state, whose purpose is to provide Pre-Employment Transition Services, be a resource for coordination activities to ensure provision of Pre-Employment Transition Services, participate in school-based meetings as appropriate, and to seek referrals of students who can benefit from SCVRD services. SCVRD also maintains an agreement with the South Carolina School for the Deaf and the Blind.

Agreements with LEAs are due for renewal in 2021 and will include language specific to youth seeking subminimum wage. SCVRD is an active partner in the Transition Alliance of SC (TASC). TASC hosts yearly conferences in which this information is shared via presentations. VR Counselors provide information sessions to school partners throughout the school year. SC's Department of Disabilities and Special Needs (SCDDSN) has three Transition Specialists who collaborate with SCVRD's Transition Coordinator and share information collaboratively at Transition Fairs, conferences and other school related activities. SCVRD's Transition Coordinator works directly with staff at the SC Department of Education, in particular, the Director of the Office of Special Education Services to share information at meetings.

Provision of Pre-Employment Transition Services is a cornerstone of the agreements with local education agencies/school districts in terms of SCVRD's role. SCVRD provides a robust set of student and youth services to enhance the transition from school to work or postsecondary training opportunities. As indicated in WIOA, SCVRD transition counselors provide Pre-Employment Transition Services for students prior to their exit from high school, and SCVRD staff continue to provide services to support placement into competitive, integrated employment, or completion of postsecondary training and/or credential-based programs.

SCVRD utilizes the five required Pre-ETS activities as a framework for school-to-work transition services. This includes regular activities that focus on job exploration counseling, work-based learning experience, counseling on opportunities for comprehensive transition or postsecondary educational programs, workplace readiness training to develop social skills and independent living skills, and instruction in self-advocacy. Group activities provide opportunities to not only facilitate peer mentoring, but also allow transition staff to observe and cultivate students' leadership skills, as well as communication and social skills. VR has expanded the outreach of Pre-ETS through the awarding of a multi-year grant to the three Independent living centers and the National Federation of the Blind to provide activities in Counseling on Post-Secondary Opportunities, Workplace Readiness Training and Instruction in Self-Advocacy.

SCVRD maintains a priority on providing work-based learning experiences for students. In keeping with evidence-based practices that support work experience to be one of the most influential factors in successful postsecondary employment outcomes, transition staff actively pursue a variety of paid and unpaid work based learning opportunities, to include job tryout, job shadowing, internship, and apprenticeship opportunities for students. This impacts not only the ultimate outcome of competitive, integrated employment but has been shown to be an integral support for school completion and drop-out prevention.

In collaboration with the SC Department of Employment and Workforce (SCDEW) and the SCDE, SCVRD's school-based transition counselors work together with local education agencies,

community partners, workforce development boards, SC Works Centers and business partners to advise students with disabilities, and their families, regarding available career pathways and educational/training opportunities.

SCVRD maintains a Transition Services Coordinator position and additional Transition Specialist positions whose duties focus on the authorized activities required for effective provision of Pre-Employment Transition Services. These include:

- Coordinate all transition-related activities and projects, including those that involve other agencies, community organizations and local SCVRD field offices;
- Develop, monitor and update all transition documents and cooperative agreements;
- Provide technical assistance, professional development and training on transition-related issues to field office staff, education personnel, community organizations, families, and students;
- Review and update consumer service policy to ensure policies and procedures are reflective of SCVRD mission and focus on quality in serving youth in transition;
- Participate in TASC, an interagency initiative to create systems change and support development of local interagency transition teams.

SCVRD continues to facilitate the development of innovative transition services to improve the successful outcomes of students and transition-aged youth. In this effort, SCVRD has integrated evidence-based practices for successful transition into the service delivery system. SCVRD also offers several additional programs to enhance transition services:

- Transition Services Specialist (TSS) – a cooperative funding initiative that enhances the general transition services offered to a school by engaging a school employee designated as the Transition Services Specialist. The TSS coordinates with the assigned SCVRD counselor, to provide Pre-Employment Transition Services. Work-based learning experiences are a critical component of the initiative. The intent of this program is to support higher rates of successful secondary school completion, enrollment in postsecondary training, and subsequent entry and maintenance of competitive, integrated employment. There are currently 21 such agreements in place. There is no third party match with our agreements.
- Project SEARCH – this nationally recognized program is a one-year high school transition internship program providing training and education leading to employment for individuals with intellectual and developmental disabilities. SCVRD has seen Project SEARCH programs expand in South Carolina to fourteen sites. There is no third party match with our agreements.
- Postsecondary Programs for Individuals with Intellectual Disabilities – SCVRD collaborates with the five postsecondary programs in South Carolina for young adults with intellectual disabilities:
  - Carolina LIFE,
  - Clemson LIFE,
  - Coastal Carolina LIFE,
  - [College of Charleston] REACH, and
  - Winthrop Think College.

Each program has an SCVRD counselor liaison who provides services for eligible students. SCVRD counselors monitor progress and assist with transition planning as the student approaches program completion. These efforts support continuity and coordination of services with the SCVRD office located in the student's hometown. These programs provide students with critical competitive employment and independent living skills. SCVRD counselors work closely with staff and students to explore careers, determine a suitable vocational goal, and assist with job placement.

SCVRD continues to explore and develop new initiatives that promote successful post-school outcomes for students with disabilities. These outcomes include competitive, integrated employment, independent living, community participation and postsecondary education.

**B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;**

SCVRD and the SCDE are signatories and partners in a Memorandum of Agreement (MOA). This agreement expresses a basic commitment on behalf of both agencies to provide comprehensive vocational and educational services to individuals with disabilities. The agreement details each entity's roles and responsibilities, including financial responsibilities, in identifying and serving students with disabilities. Items covered in the agreement include: student identification and exchange of information, procedures for outreach to students with disabilities who need transition services, methods for dispute resolution, consultation and technical assistance to assist educational agencies in planning for school-to-work transition activities, and the requirements for regular monitoring of the agreement. Timing of student referrals is individualized based on need but should generally occur no later than the second semester of the year prior to the student's exit from school.

Using the SCVRD-SCDE MOA as a model, SCVRD has developed agreements with all local education agencies in the state. These MOAs clarify roles and responsibilities at the local level. There is an SCVRD counselor assigned to each of the high schools in the state, whose purpose is to provide Pre-Employment Transition Services, be a resource for coordination activities to ensure provision of Pre-Employment Transition Services, participate in school-based meetings as appropriate, and to seek referrals of students who can benefit from SCVRD services. SCVRD also maintains an agreement with the South Carolina School for the Deaf and the Blind.

Provision of Pre-Employment Transition Services is a cornerstone of the agreements with local education agencies/school districts in terms of SCVRD's role. SCVRD provides a robust set of student and youth services to enhance the transition from school to work or postsecondary training opportunities. As indicated in WIOA, SCVRD transition counselors provide Pre-Employment Transition Services for students prior to their exit from high school, and SCVRD staff continue to provide services to support placement into competitive, integrated employment, or completion of postsecondary training and/or credential-based programs.

SCVRD utilizes the five required Pre-ETS activities as a framework for school-to-work transition services. This includes regular activities that focus on job exploration counseling, work-based learning experience, counseling on opportunities for comprehensive transition or postsecondary educational programs, workplace readiness training to develop social skills and independent living skills, and instruction in self-advocacy. Group activities provide opportunities to not only facilitate peer mentoring, but also allow transition staff to observe and cultivate students' leadership skills, as well as communication and social skills. VR has expanded the outreach of Pre-ETS through the awarding of a multi-year grant to the three Independent living centers and the National Federation of the Blind to provide activities in Counseling on Post-Secondary Opportunities, Workplace Readiness Training and Instruction in Self-Advocacy.

SCVRD maintains a priority on providing work-based learning experiences for students. In keeping with evidence-based practices that support work experience to be one of the most influential factors in successful postsecondary employment outcomes, transition staff actively pursue a variety of paid and unpaid work based learning opportunities, to include job tryout, job shadowing, internship, and apprenticeship opportunities for students. This impacts not only the ultimate outcome of competitive, integrated employment but has been shown to be an integral support for school completion and drop-out prevention.

In collaboration with the SC Department of Employment and Workforce (SCDEW) and the SCDE, SCVRD's school-based transition counselors work together with local education agencies, community partners, workforce development boards, SC Works Centers and business partners to advise students with disabilities, and their families, regarding available career pathways and educational/training opportunities.

SCVRD maintains a Transition Services Coordinator position and additional Transition Specialist positions whose duties focus on the authorized activities required for effective provision of Pre-Employment Transition Services. These include:

- Coordinate all transition-related activities and projects, including those that involve other agencies, community organizations and local SCVRD field offices;
- Develop, monitor and update all transition documents and cooperative agreements;
- Provide technical assistance, professional development and training on transition-related issues to field office staff, education personnel, community organizations, families, and students;
- Review and update consumer service policy to ensure policies and procedures are reflective of SCVRD mission and focus on quality in serving youth in transition;
- Participate in TASC, an interagency initiative to create systems change and support development of local interagency transition teams.

SCVRD continues to facilitate the development of innovative transition services to improve the successful outcomes of students and transition-aged youth. In this effort, SCVRD has integrated evidence-based practices for successful transition into the service delivery system. SCVRD also offers several additional programs to enhance transition services:

- Transition Services Specialist (TSS) – a cooperative funding initiative that enhances the general transition services offered to a school by engaging a school employee designated as the Transition Services Specialist. The TSS coordinates with the assigned SCVRD counselor, to provide Pre-Employment Transition Services. Work-based learning experiences are a critical component of the initiative. The intent of this program is to support higher rates of successful secondary school completion, enrollment in postsecondary training, and subsequent entry and maintenance of competitive, integrated employment. There are currently 21 such agreements in place.
- Project SEARCH – this nationally recognized program is a one-year high school transition internship program providing training and education leading to employment for individuals with intellectual and developmental disabilities. SCVRD has seen Project SEARCH programs expand in South Carolina to fourteen sites.
- Postsecondary Programs for Individuals with Intellectual Disabilities – SCVRD collaborates with the five postsecondary programs in South Carolina for young adults with intellectual disabilities:
  - Carolina LIFE,

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- [College of Charleston] REACH, and
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Each program has an SCVRD counselor liaison who provides services for eligible students. SCVRD counselors monitor progress and assist with transition planning as the student approaches program completion. These efforts support continuity and coordination of services with the SCVRD office located in the student's hometown. These programs provide students with critical competitive employment and independent living skills. SCVRD counselors work closely with staff and students to explore careers, determine a suitable vocational goal, and assist with job placement.

SCVRD continues to explore and develop new initiatives that promote successful post-school outcomes for students with disabilities. These outcomes include competitive, integrated employment, independent living, community participation and postsecondary education.

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

SCVRD and the SCDE are signatories and partners in a Memorandum of Agreement (MOA). This agreement expresses a basic commitment on behalf of both agencies to provide comprehensive vocational and educational services to individuals with disabilities. The agreement details each entity's roles and responsibilities, including financial responsibilities, in identifying and serving students with disabilities. Items covered in the agreement include: student identification and exchange of information, procedures for outreach to students with disabilities who need transition services, methods for dispute resolution, consultation and technical assistance to assist educational agencies in planning for school-to-work transition activities, and the requirements for regular monitoring of the agreement. Timing of student referrals is individualized based on need but should generally occur no later than the second semester of the year prior to the student's exit from school.

While SCDE and SCVRD do not exchange funds, the MOA outlines the following fiscal responsibilities:

SCDE is responsible for fulfilling its obligation under IDEA to procure for related services necessary for students with disabilities to benefit from special education as outlined in the students' Individual Education Plans, including appropriate accommodations, modifications, and instructional strategies. For students with disabilities enrolled in the Career and Technology education programs, Carl Perkins funds are used to provide supplemental services to students with disabilities who are members of special populations including all necessary modifications and supports as identified on the student's IEP.

Decisions about the amount and type of services provided by SCVRD are individually based upon the student's identified need(s) and necessary to achieve the mutually agreed upon vocational goal. A student may be involved in one or more services, some of which are based on the family's financial participation.

SCVRD will provide financial resources (case services dollars) for eligible consumers as determined by SCVRD in accordance with its financial needs analysis and its established policy for provision of VR services.

The MOA indicates that nothing in the agreement will be construed to reduce the obligation under the Individuals with Disabilities Education Act of a local educational agency or other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to children with disabilities.

Using the SCVRD-SCDE MOA as a model, SCVRD has developed agreements with all local education agencies in the state. These MOAs clarify roles and responsibilities at the local level. Each high school in SC has a designated VR Counselor whose purpose is to provide Pre-Employment Transition Services, be a resource for coordination activities to ensure provision of Pre-Employment Transition Services, participate in school-based meetings as appropriate, and to seek and identify referrals of students who can benefit from SCVRD services. SCVRD also maintains an agreement with the South Carolina School for the Deaf and the Blind.

Provision of Pre-Employment Transition Services is a cornerstone of the agreements with local education agencies/school districts in terms of SCVRD's role. SCVRD provides a robust set of student and youth services to enhance the transition from school to work or postsecondary training opportunities. As indicated in WIOA, SCVRD transition counselors provide Pre-Employment Transition Services for students prior to their exit from high school, and SCVRD staff continue to provide services to support placement into competitive, integrated employment, or completion of postsecondary training and/or credential-based programs.

SCVRD utilizes the five required Pre-ETS activities as a framework for school-to-work transition services. This includes regular activities that focus on job exploration counseling, work-based learning experience, counseling on opportunities for comprehensive transition or postsecondary educational programs, workplace readiness training to develop social skills and independent living skills, and instruction in self-advocacy. Group activities provide opportunities to not only facilitate peer mentoring, but also allow transition staff to observe and cultivate students' leadership skills, as well as communication and social skills. SCVRD works with other entities besides the high schools to identify students in need of Pre-ETS and transition services. The Agency may coordinate with community partners, to include schools, in transition and community fairs for parents and students. VR Counselors, in addition to the State VR Transition unit, often present and speak at state and local conferences and meetings in an effort to share information about available services. SCVRD has expanded the outreach of Pre-ETS through the awarding of a multi-year grant to the three Independent Living Centers and the National Federation of the Blind to provide activities in Counseling on Post-Secondary Opportunities, Workplace Readiness Training and Instruction in Self-Advocacy. These vendors interact with local and state VR staff to identify students who can benefit from VR services. SCVRD has funded several positions with school districts to provide Pre-ETS and collaborate with the local VR office to identify students who may benefit from VR services as well. The State level transition team has a referral tracking system and works with the SC Department of Disabilities and Special Needs and two Virtual Online K-12 schools to maintain and track referrals of students who may be in need of VR services. SCVRD has a website with information specific to transition and marketing materials which are frequently shared with students, parents and community partners.

SCVRD maintains a priority on providing work-based learning experiences for students. In keeping with evidence-based practices that support work experience to be one of the most influential factors in successful postsecondary employment outcomes, transition staff actively pursue a variety of paid and unpaid work based learning opportunities, to include job tryout, job shadowing, internship, and apprenticeship opportunities for students. This impacts not only the ultimate outcome of competitive, integrated employment but has been shown to be an integral support for school completion and drop-out prevention.

In collaboration with the SC Department of Employment and Workforce (SCDEW) and the SCDE, SCVRD's school-based transition counselors work together with local education agencies, community partners, workforce development boards, SC Works Centers and business partners to advise students with disabilities, and their families, regarding available career pathways and educational/training opportunities.

SCVRD maintains a Transition Services Coordinator position and additional Transition Specialist positions whose duties focus on the authorized activities required for effective provision of Pre-Employment Transition Services. These include:

- Coordinate all transition-related activities and projects, including those that involve other agencies, community organizations and local SCVRD field offices;
- Develop, monitor and update all transition documents and cooperative agreements;
- Provide technical assistance, professional development and training on transition-related issues to field office staff, education personnel, community organizations, families, and students;
- Review and update consumer service policy to ensure policies and procedures are reflective of SCVRD mission and focus on quality in serving youth in transition;
- Participate in TASC, an interagency initiative to create systems change and support development of local interagency transition teams.

SCVRD continues to facilitate the development of innovative transition services to improve the successful outcomes of students and transition-aged youth. In this effort, SCVRD has integrated evidence-based practices for successful transition into the service delivery system. SCVRD also offers several additional programs to enhance transition services:

- Transition Services Specialist (TSS) – a cooperative funding initiative that enhances the general transition services offered to a school by engaging a school employee designated as the Transition Services Specialist. The TSS coordinates with the assigned SCVRD counselor, to provide Pre-Employment Transition Services. Work-based learning experiences are a critical component of the initiative. The intent of this program is to support higher rates of successful secondary school completion, enrollment in postsecondary training, and subsequent entry and maintenance of competitive, integrated employment. There are currently 21 such agreements in place.
- Project SEARCH – this nationally recognized program is a one-year high school transition internship program providing training and education leading to employment for individuals with intellectual and developmental disabilities. SCVRD has seen Project SEARCH programs expand in South Carolina to fourteen sites.
- Postsecondary Programs for Individuals with Intellectual Disabilities – SCVRD collaborates with the five postsecondary programs in South Carolina for young adults with intellectual disabilities:
  - Carolina LIFE,
  - Clemson LIFE,
  - Coastal Carolina LIFE,
  - [College of Charleston] REACH, and
  - Winthrop Think College.

Each program has an SCVRD counselor liaison who provides services for eligible students. SCVRD counselors monitor progress and assist with transition planning as the student approaches program completion. These efforts support continuity and coordination of services with the SCVRD office located in the student's hometown. These programs provide students with critical competitive employment and independent living skills. SCVRD counselors work closely with staff and students to explore careers, determine a suitable vocational goal, and assist with job placement.

SCVRD continues to explore and develop new initiatives that promote successful post-school outcomes for students with disabilities. These outcomes include competitive, integrated employment, independent living, community participation and postsecondary education.

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

SCVRD and the SCDE are signatories and partners in a Memorandum of Agreement (MOA). This agreement expresses a basic commitment on behalf of both agencies to provide comprehensive vocational and educational services to individuals with disabilities. The agreement details each entity's roles and responsibilities, including financial responsibilities, in identifying and serving students with disabilities. Items covered in the agreement include: student identification and exchange of information, procedures for outreach to students with disabilities who need transition services, methods for dispute resolution, consultation and technical assistance to assist educational agencies in planning for school-to-work transition activities, and the requirements for regular monitoring of the agreement. Timing of student referrals is individualized based on need but should generally occur no later than the second semester of the year prior to the student's exit from school.

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In collaboration with the SC Department of Employment and Workforce (SCDEW) and the SCDE, SCVRD's school-based transition counselors work together with local education agencies, community partners, workforce development boards, SC Works Centers and business partners to advise students with disabilities, and their families, regarding available career pathways and educational/training opportunities.

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- Review and update consumer service policy to ensure policies and procedures are reflective of SCVRD mission and focus on quality in serving youth in transition;
- Participate in TASC, an interagency initiative to create systems change and support development of local interagency transition teams.

SCVRD continues to facilitate the development of innovative transition services to improve the successful outcomes of students and transition-aged youth. In this effort, SCVRD has integrated evidence-based practices for successful transition into the service delivery system. SCVRD also offers several additional programs to enhance transition services:

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  - Carolina LIFE,
  - Clemson LIFE,
  - Coastal Carolina LIFE,
  - [College of Charleston] REACH, and
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SCVRD continues to explore and develop new initiatives that promote successful post-school outcomes for students with disabilities. These outcomes include competitive, integrated employment, independent living, community participation and postsecondary education.

#### *e. Cooperative Agreements with Private Nonprofit Organizations*

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Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

The designated state unit, the Statewide Independent Living Council established under Section 705 of the Rehabilitation Act of 1973 as amended by WIOA, and the independent living centers described in Part C of Chapter I of Title VII of the Rehabilitation Act have developed working relationships and coordinate their activities. In addition, TASC is an interagency group whose mission is to increase successful student postsecondary transition outcomes through active, interagency collaboration. With 16 partner agencies, TASC works to support transition services through training, professional development, and technical assistance provided to local interagency teams that provide direct transition services, both at the pre-employment stage and following postsecondary activities. SCVRD has cooperative agreements and works collaboratively with other non-profit organizations and partners such as the SC Developmental Disabilities Council, Spinal Cord Injury Association, and multiple other community organizations.

#### *f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services*

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Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide

supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

SCVRD's supported employment goals and plans regarding the Title VI program are based on an analysis of the comprehensive statewide needs assessment and the department's performance on the common performance measures as well as agency key performance indicators. The priorities are as follows:

- Strengthening service delivery afforded to individuals whose disabilities and vocational needs are so significant that SCVRD's 110 traditional program services would not be sufficient to meet their employment needs;
- Providing services to people with the most significant disabilities, especially SSI and/or SSDI recipients, in order to successfully achieve and maintain competitive employment in integrated work settings; and
- Providing supported employment services to youth with the most significant disabilities.

In PY 2018, SCVRD used designated funds received under section 603 of the Rehabilitation Act for the provision of supported employment services for the following goals and priorities:

- Job coaches serving the Conway, Sumter, Spartanburg, and Lexington areas.
- SCVRD continues its partnership with DDSN in an ongoing demonstration project designed as an intensive placement and support program in the Lexington area. DDSN makes referrals to a specified VR counselor and job coach who are designated to exclusively serve these consumers. This demonstration project incorporates many of the IPS evidence-based practices in providing services to individuals with most significant disabilities, including those with intellectual disabilities. The key practices focus on individualized, consumer-centered services to assist persons with cognitive impairments and emphasize rapid job placement, as appropriate, into competitive, integrated jobs. Follow up supports are provided in integrated work settings. In PY 2018, the Lexington site achieved a 100 percent rehabilitation rate.

Activities with funds reserved for services for youth with the most significant disabilities (section 603(d)) included the following:

- Project SEARCH is a national model based on intensive internship experience and job coaching. It pairs students in their final year of school with a host business/employer site that includes a series of internships to build job skills as well as to explore career opportunities. This program model is business-led, with partner support provided through the school district, VR, Developmental Disabilities agencies and other community partners. It focuses on serving young adults with intellectual and developmental disabilities, as well as other students who may not otherwise have access to the immersion-based approach of this program. Interns in Project SEARCH train in real work settings, which allows the program staff to teach competitive, marketable, and transferable skills. The outcome goal of the program is competitive, integrated employment. The first site in South Carolina was established in Spartanburg during SFY 2014 (prior to WIOA)
- This has now expanded to fourteen sites. In this program, students participate in a series of internships at a host business site, receive intensive instruction and job coaching, and are placed into competitive employment, often at the host business site, and often prior to completion of their final year of high school. The ten sites that have been operating for longer than one year have an average success rate of 77% (participants achieving competitive, integrated employment).
- SCVRD leverages other public and private funds to increase resources for extended services. Extended services providers are identified in each area to provide follow along and extended

services following successful exit from the VR program. Partnerships at the state and local level with DDSN and the local DSN boards and other DDSN-contracted providers continue to grow and provide key linkages to extended services providers.

- Strategies that contributed to the achievement of overall goals and specific objectives included:
  - Review and measurement of key performance indicators on a quarterly basis;
  - Monthly monitoring and specialized reporting on the results of outreach efforts to underserved and emerging disability populations;
  - Monthly monitoring and specialized reporting on services to youth and Pre-Employment Transition Services;
  - Dedicated staff for specific populations and specialized services: school-to-work transition; deaf and hard of hearing; supported employment; and
  - Demonstration programs to enhance supported employment services and services for youth with the most significant disabilities, individuals diagnosed with ASD, and demand-driven training based on community labor market information.

### *g. Coordination with Employers*

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Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

#### **1. VR Services; and**

SCVRD utilizes multiple methods of working with employers to identify competitive, integrated employment and career exploration opportunities to facilitate the provision of VR services. On a statewide and local basis, the Business Partnership Network, or BPN, provides an opportunity for regular engagement with business partners to gain input on hiring needs, training curricula, and opportunities for outreach with business and industry. Business Advisory Councils (BACs) are established to provide input on specific programs, such as the IT Training Centers, in Columbia and at the Bryant Center in Lyman. Members of the BAC assist in evaluating courses of study and curricula to ensure SCVRD stays current with what is needed in the workplace for IT professionals. Also, SCVRD utilizes Business Development Specialists (BDSs) across the state, whose role is to identify opportunities for training, work-based learning, job development and placement, and emerging career pathways. BDS staff also participate in the SC Sector Strategies partnership in an effort to develop a system that supports strong regional economies by aligning the resources of all partners, public and private, toward developing a workforce supply chain that enhances development of consensus-based targeted industry sectors and creates meaningful career pathways for a range of workers with various skill levels. They work collaboratively, in an integrated fashion, to address any skill gaps and to ensure that the talent pipeline process is fully developed. The BDS staff also use an internal data system to capture and distribute information to ensure that all staff data efforts are fully leveraged and that the team is operating from the same information. BDS staff participate on local business service teams, along with partners from SC Works and LWDBs, to provide a coordinated approach to business development activities.

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

SCVRD utilizes multiple methods of working with employers to identify competitive, integrated employment and career exploration opportunities to facilitate the provision of transition services, including Pre-Employment Transition Services, for students and youth with disabilities. On a statewide and local basis, the Business Partnership Network, or BPN, provides an opportunity for regular engagement with business partners to gain input on hiring needs, training curricula, and opportunities for outreach with business and industry. Business Advisory Councils (BACs) are established to provide

input on specific programs. The coordination with employers with regards to Pre-Employment Transition Services and youth includes assistance from the BDS, school district partners and other youth oriented community agencies to host transition fairs where students and youth can meet with employers. Coordination also includes work based learning experiences to include tours and job shadowing opportunities. BDS staff also work with transition counselors and coaches to identify opportunities for work-based learning experiences, internships, apprenticeships, and OJT for students in conjunction with the Pre-Employment Transition Services that are provided in high school settings. And, they help address roadblocks and process obstacles that cannot otherwise be resolved.

#### *h. Interagency Cooperation*

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Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

##### **1. The State Medicaid plan under title XIX of the Social Security Act;**

SCVRD has established a Memorandum of Understanding (MOU) with DHHS, the agency responsible for administering the state Medicaid plan. This MOU outlines roles, responsibilities, and collaborative efforts of both agencies. The purpose and objectives of this MOU include strengthening the partnership between the two agencies, with the ultimate outcome of developing opportunities for competitive, integrated employment for Medicaid beneficiaries who have disabilities. SCVRD staff have provided an in-person overview of the vocational rehabilitation program for relevant DHHS staff, and a quarterly meeting schedule has been established for joint planning of ways to enhance the partnership and improve outcomes for dual consumers.

##### **2. The State agency responsible for providing services for individuals with developmental disabilities; and**

SCVRD is currently working with DDSN to incorporate guidance received from the Centers for Medicare and Medicaid Services (CMS) and the Workforce Innovation Technical Assistance Center (WINTAC) into an enhanced MOU aimed at addressing sequencing of services and braiding of funding for complementary service provision to jointly served consumers. Staff works collaboratively with local Disabilities and Special Needs (DSN) boards and other DDN-contracted providers in serving individuals in need of supported employment services and long-term follow along supports to maintain competitive, integrated employment. DDSN has representatives on TASC to assist in school-to-work transition efforts as well as ensuring youth with the most significant disabilities have access to the supports needed to gain and maintain competitive employment. Through these efforts, consumers are served in a complementary fashion based on the expertise and distinct roles of each agency.

In addition, SCVRD works closely with the SC Developmental Disabilities Council, an Executive Program designated to the SC Department of Administration. Collaborative efforts include partnering on many projects and grant-funded initiatives, as well as being signatories to an MOU for the TASC.

##### **3. The State agency responsible for providing mental health services.**

SCVRD works collaboratively with DMH and has an established MOA that outlines roles, responsibilities, and referral procedures. In addition, several cooperative agreements are in place across the state for Individualized Placement and Support (IPS) caseloads to provide rapid placement and job coaching for individuals with severe and persistent mental illness. In 2019, DMH expanded its IPS Program to every mental health center in the state. There are currently 17 IPS sites in South Carolina. Transition counselors working within the schools to provide Pre-Employment Transition Services coordinate with school-based mental health counselors to identify students in need of services, whether that is VR or mental health services. Through this "no wrong door" approach, students in need of services are connected to the appropriate resources in a timely manner.

## *i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development*

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. System on Personnel and Personnel Development

#### A. Qualified Personnel Needs

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

- i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;*

Staffing patterns are set through a joint effort of the SCVRD commissioner, director of human resources, executive staff, and local supervisors. Employee turnover data are reviewed in an effort to determine trends and to identify staffing concerns. In addition, succession planning for critical need positions is being managed through the department's Leadership Development Program (LDP). The LDP is a more targeted approach to succession planning than the former program (the Professional Development and Leadership Program). The LDP was designed to maximize the use of our staff members' time and to better meet the specific talent needs of the Agency. SCVRD utilizes a caseload management system that allows for monitoring and planning for service delivery capacity based on referral sources and the projected number of individuals expected to receive services. Below is a chart, which provides details, by personnel category, on the number of personnel needed and currently employed in the provision of vocational rehabilitation services at SCVRD.

JOB TITLE	TOTAL POSITIONS	CURRENT VACANCIES	PROJECTED VACANCIES OVER THE NEXT 5 YEARS
COUNSELORS	203	20	122
AREA CONSUMER SERVICES MANAGERS	24	4	14
VOCATIONAL EVALUATORS AND JOB PREPAREDNESS INSTRUCTORS	39	7	23
JOB-READINESS TRAINERS	77	13	46
AREA SUPERVISORS	26	3	16
TRAINING CENTER MANAGERS	31	0	19
EMPLOYMENT/JOB COACHES	36	9	23

VI. PROGRAM-

JOB TITLE	TOTAL POSITIONS	CURRENT VACANCIES	PROJECTED VACANCIES OVER THE NEXT 5 YEARS
ADMINISTRATIVE & TEAM SUPPORT SPECIALISTS AND AREA ADMINISTRATIVE ASSISTANTS	73	12	44
ADDICTIONS COUNSELORS	5	1	3
TRANSITION COACHES	14	4	8
BUSINESS DEVELOPMENT SPECIALISTS	19	2	11

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

Staffing patterns are set through a joint effort of the SCVRD commissioner, director of human resources, executive staff, and local supervisors. Employee turnover data are reviewed in an effort to determine trends and to identify staffing concerns. In addition, succession planning for critical need positions is being managed through the department's Leadership Development Program (LDP). The LDP is a more targeted approach to succession planning than the former program (the Professional Development and Leadership Program). The LDP was designed to maximize the use of our staff members' time and to better meet the specific talent needs of the Agency. SCVRD utilizes a caseload management system that allows for monitoring and planning for service delivery capacity based on referral sources and the projected number of individuals expected to receive services. Below is a chart, which provides details, by personnel category, on the number of personnel needed and currently employed in the provision of vocational rehabilitation services at SCVRD.

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BUSINESS DEVELOPMENT SPECIALISTS	19	2	11

*iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.*

Staffing patterns are set through a joint effort of the SCVRD commissioner, director of human resources, executive staff, and local supervisors. Employee turnover data are reviewed in an effort to determine trends and to identify staffing concerns. In addition, succession planning for critical need positions is being managed through the department's Leadership Development Program (LDP). The LDP is a more targeted approach to succession planning than the former program (the Professional Development and Leadership Program). The LDP was designed to maximize the use of our staff members' time and to better meet the specific talent needs of the Agency. SCVRD utilizes a caseload management system that allows for monitoring and planning for service delivery capacity based on referral sources and the projected number of individuals expected to receive services. Below is a chart, which provides details, by personnel category, on the number of personnel needed and currently employed in the provision of vocational rehabilitation services at SCVRD.

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## B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

- i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;*

SCVRD maintains close relationships with the University of South Carolina and South Carolina State University, both of which produce graduates who have Master's degrees in rehabilitation counseling. SCVRD has opted to use a state Comprehensive System of Personnel Development (CSPD) standard and can recruit not only from candidates with a Master's degree in rehabilitation counseling, but also with a Master's degree in related fields. These strategies satisfy staffing needs.

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

The following chart shows statistics for the in-state university vocational rehabilitation counseling degree programs. All graduates are eligible for Certified Rehabilitation Counselor (CRC) certification and the South Carolina Licensed Professional Counselor (LPC) designation. As of this date, 2 have obtained their CRC certification. Data are collected annually by program directors at each university and shared with executive staff to assist in current and future staffing.

VI. PROGRAM-

INSTITUTIONS	TOTAL MRC/MA STUDENTS ENROLLED	EMPLOYEES SPONSORED BY AGENCY AND/OR RSA	GRADUATES SPONSORED BY AGENCY AND/OR RSA	TOTAL MRC/MA GRADUATED FROM THE PREVIOUS YEAR
SC STATE UNIVERSITY REHAB. COUNSELING PROGRAM	45	7	20	30
UNIVERSITY OF SOUTH CAROLINA REHAB. COUNSELING PROGRAM	40	10	9	9

*iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.*

The following chart shows statistics for the in-state university vocational rehabilitation counseling degree programs. All graduates are eligible for Certified Rehabilitation Counselor (CRC) certification and the South Carolina Licensed Professional Counselor (LPC) designation. As of this date, 2 have obtained their CRC certification. Data are collected annually by program directors at each university and shared with executive staff to assist in current and future staffing.

INSTITUTIONS	TOTAL MRC/MA STUDENTS ENROLLED	EMPLOYEES SPONSORED BY AGENCY AND/OR RSA	GRADUATES SPONSORED BY AGENCY AND/OR RSA	TOTAL MRC/MA GRADUATED FROM THE PREVIOUS YEAR
SC STATE UNIVERSITY REHAB. COUNSELING PROGRAM	45	7	20	30
UNIVERSITY OF SOUTH CAROLINA REHAB. COUNSELING PROGRAM	40	10	9	9

## 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Progress toward meeting the required CSPD standard began in January 2001. The department has a working relationship with the University of South Carolina and South Carolina State University (a historically black university), both of which offer all of the courses required by the Council for Accreditation of Counseling and Related Educational Programs (CACREP). A recruitment plan is in place to recruit graduates from all schools in South Carolina as well as out-of-state schools which have counseling and rehabilitation counseling degree programs. When this is not possible due to high demand, the department will continue to hire counselors with closely related Master's degrees. In accordance with South Carolina state law, each transcript is assessed, and the counselor is placed in a plan that allows up to 30 months to complete the current state educational requirements.

The University of South Carolina and South Carolina State University prepare individuals for graduate degrees in rehabilitation counseling. SCVRD conducts outreach programs to these universities and other universities to include: publications and distribution of targeted recruiting material, attendance at career days and job fairs, and recruitment events. In addition, practicum placements and internships are offered to students who are in CSPD qualifying programs. These efforts are designed to recruit qualified personnel, including minority graduates and those with disabilities. SCVRD Human Resources and Human Resources Development offices coordinate recruitment efforts with active support from local supervisors.

Employees of the department work with school officials to provide input for curriculum development for the graduate school programs. SCVRD leadership has actively participated on advisory boards for the rehabilitation counseling programs at the University of South Carolina and South Carolina State University.. SCVRD has been especially successful in recruiting personnel from the South Carolina universities, particularly those from minority backgrounds. Students from these programs and out-of-state programs are encouraged to accept student internships and practicums placements with the department. The HRD staff, with input from the human resources department, coordinates the placement of non-paid practicum and internships, and the human resources department coordinates placements for students who qualify for paid internships. In addition, university faculty members periodically conduct skills classes for staff at department facilities.

A substantial New Employee Orientation program is vital to the recruitment and retention of SCVRD staff. All new staff members are required to complete New Employee Orientation Parts I, II, and III. New Employee Orientation is intensive and comprehensive. The orientation program incorporates training in the following topics:

- A history of vocational rehabilitation
- Philosophical overview
- SCVRD agency mission, policies, procedures, and benefits
- An overview of training requirements and an intro to online training
- Ethics in the workplace
- Consumer Relations and CAP (Client Assistance Program)
- Disability awareness and disability etiquette
- Customer service
- True Colors (personality assessment for team building)
- Medical and psychosocial aspects of specific disabilities
- Safety in the workplace
- Nonviolent crisis intervention
- Cyber Security and Personally Identifiable Information (PII)
- Panic alarm system
- Human Resources Development
- Communications
- Time management
- Job specific training
- SCVRD Grievance Procedures for Handling Consumer Discrimination Complaints

New employees are assigned mentors, participate in job shadowing, and receive performance coaching from their supervisors.

New counselors and selected direct service delivery staff are required to take the following training sessions:

- Motivational Interviewing
- Medical terminology (for those who did not have this as a graduate course)
- Consumer Services training
  - \*Counseling Skills training
  - Rehabilitation technology online trainings

In addition to the New Employee Orientation program and to retain qualified staff, SCVRD uses a system for staff evaluation that is a modification of a system that is available to all state employees (The Employee Performance Management System or EPMS). The system focuses on the individual employees' job duties compared to stated goals and objectives. These goals and objectives are identified and discussed with the employee at the beginning of the rating period. Ongoing communication between the employee and supervisor clarifies the employee's understanding of how to meet the performance standards and enhance service delivery to the consumer.

At the conclusion of the rating period, an evaluation is performed to rate the employee on each duty in relation to performance objectives. The system provides for employee input into the development of the goals and objectives in order to support successful performance.

Another feature of the system allows objectives to be amended throughout the review period. This system also provides a mechanism for helping a substandard performer improve and a means of removing an employee from a position should performance not improve to an acceptable level. It is as follows:

- A covered employee is entitled to adequate notice of substandard performance and the opportunity to improve the substandard performance before receiving a "below performance requirements" rating and being removed from the position. If during the performance period an employee is considered "below performance requirements" in any essential job function or objective which significantly impacts performance, the employee may be provided with a written "Warning Notice of Substandard Performance." The warning notice shall provide for an improvement period of no less than 30 days and no more than 120 days. The warning notice may be issued at any time during the review period. An employee who receives more than two warning notices within a 365-day period shall be removed from the position. A warning notice is not required on the third occurrence.
- The department has developed career path matrices for staff to encourage retention of qualified staff and promotion to higher level positions. These career paths are keyed to requirements in the areas of education, experience, productivity, quality, and training. The matrices include elements related to the department's Program Integrity model which emphasizes a balance among customer service, compliance assurance, and productivity. Counselors are required to meet the state's CSPD standard within the required time frame in order to maintain status as a counselor and to advance to a higher level. A counselor who does not achieve the state CSPD standard within the required timeframes will be removed from his/her position. The career path matrices are published on SCVRD's intranet site.
- The department takes an active role in employee/employer relations. Through strong leadership and the assistance of all staff, the department provides a healthy and safe work environment. Employee behavior and performance problems are dealt with appropriately and in a timely

manner, with an emphasis on assisting the employee to improve. The department promotes internal and external customer service and has made teamwork an integral part of day-to-day operations. The department's Celebration of Success program (a reward and recognition system) allows employees to recognize coworkers for customer service, productivity, program excellence, as well as individual accomplishments.

### 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

**A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and**  
Section 101(a)(7)(B) of the Act; 34 CFR 361.18 indicates that the state VR agency is to establish and maintain standards to ensure that all professional personnel are prepared and trained and that the standards are consistent with national or state approved requirements. Given this option of selecting federal or state standards in order to achieve stability regarding standards and to develop a diverse staff, SCVRD has opted to use state standards to manage its CSPD, which are consistent with the initial guidelines. In 2006, the South Carolina General Assembly passed a bill, which established a state standard for the minimum educational and training requirements for counselors of the public vocational rehabilitation agency. This bill was signed by the governor on March 15, 2006. Under this state law, the department can continue its practice of hiring individuals with rehabilitation-related Master's degrees while mandating that they complete Master's level rehabilitation courses commensurate with their degree. The law reads as follows:

A State Agency of Vocational Rehabilitation Counselor must meet the following standards: a Master's degree in rehabilitation counseling, a master's degree in the field of counseling with a graduate course in theories and techniques of counseling, or a Master's degree in any discipline. In addition to the Master's degree, the individual shall be required to document at least 18 credit hours of coursework at the Master's level or above, within thirty months of date of hire, in the core areas that follow: one graduate course with a primary focus on the theories and techniques of counseling and three graduate courses, each with a primary focus on one of the following areas: occupational information, job development and placement, medical aspects of disabilities, foundations of rehabilitation, psychological aspects of disabilities, and personal and vocational adjustment; and two graduate courses, each with a primary focus on one of the following areas: assessment, research methodology, vocational and career development, community resources, case management, and delivery of rehabilitation services, or a current Certified Rehabilitation Counselor (CRC) certification, regardless of degree.

As stated in detail in the previous section of this document, qualified candidates are recruited from universities who meet the minimum requirements of the state's CSPD standard. Internships and practicum opportunities are also offered to qualified candidates. Each candidate's transcript is reviewed and evaluated. New hires who do not meet the standard are immediately placed in a program to meet the standard within the 30-month time frame.

Of the 306 general counselors (includes counselors, and 8 addictions counselors and area consumer services managers) who are currently employed by SCVRD, 272 meet the state's CSPD standard for a rehabilitation counselor. Thirty-four (34) counselors have Master's degrees in a related field and are currently under a plan to complete requirements.

Funding support for the implementation of a retraining plan to assist VR counselors to meet the state educational requirement of CSPD has traditionally been provided by the department's In-Service Training Grant. Due to discontinuation of the RSA in-service training grant this cost has been absorbed into the agency's overall budget effective 10/1/2015. Other funding options may be provided by RSA grants, if available. Evaluation of the plan to ensure that VR counselors meet the CSPD requirements is conducted through an analysis of transcripts and the department's electronic training records.

**B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.**

As part of the agency's initiative to expand skills-based, demand driven training, staff are currently trained on accessing and utilizing labor market information for their local communities. In coordination with local BDSs, staff identifies in-demand industries and occupations and develops localized training or connects with the technical college system and other institutions of higher education to provide consumers access to training commensurate with the evolving labor force. In addition, SCVRD is a partner in a statewide Talent Pipeline/Sector Strategies Project aimed at closing skills gaps and meeting the workforce needs of the current and emerging labor market through collaborative development of career pathways and identification of training and certifications required by employers to meet their hiring needs.

Paraprofessional staff must meet minimum hiring requirements according to position descriptions.

#### **4. Staff Development**

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

**A. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and**

SCVRD conducts needs assessments in order to plan for a balanced HRD program for all staff. The assessments take into account skill development, as well as long-range career opportunities directed toward developing and strengthening the role of qualified rehabilitation professionals and paraprofessionals. Needs assessments are conducted and evaluated by supervisors and HRD. The information is collected from multiple sources and formulated into a comprehensive HRD program. Institutions of higher education and appropriate professional associations are used to facilitate the recruitment, preparation, and retention of qualified personnel.

In addition to these efforts, the department provides, when appropriate and subject to the availability of funds, tuition assistance to employees who are taking work-related courses.

As part of its retention and succession planning, the department has completed its transition from its generalized Professional Development and Leadership Program to a more role-oriented Leadership Development Program (LDP) that will address immediate needs identified through evaluation of critical positions. The plan provides career development opportunities for staff via career paths, and targeted training opportunities. Five SCVRD staff members were in the first

"graduating class" of this program in 2019. The Human Resource Development department provides professional development courses for staff statewide. The agency utilizes training provided by various technical assistance centers and other training professionals, management/supervision courses offered by the South Carolina Division of Human Resources and in-house training. A separate Supervision and Management track continues that focuses on meeting the training needs of new and existing supervisors. During this year, supervisors received training on various leadership topics to include communication, conflict management, coaching, managing priorities and projects, managing emotions under pressure, supervisory practices, and teambuilding.

SCVRD has an extensive HRD department that facilitates training for all employees, with programmatic training being provided by internal and external subject matter experts. The department provides/sponsors trainings that focus on medical, psychosocial, and vocational aspects of specific disabilities, and feature the application of assistive technology as appropriate. Recent topics include: disability etiquette, brain injury, alcohol/drug addictions, multiple sclerosis, mental illness, autism, deafness and hearing impairments, epilepsy, learning disabilities, musculoskeletal, spinal cord injury, diabetes, as well as other disability-specific trainings. Workshops on transition from school to work, HS/HT, supported employment, job retention services, vocational assessment, serving ex-offenders, serving the Hispanic/Latino population, leadership development, and maintaining a culture of quality were also provided.

Counseling skills training is provided on an ongoing basis with a focus on motivational interviewing techniques. A series of statewide trainings focusing on providing specific counseling skills and the application of those skills within the VR setting to counselors and other staff who provide direct services to consumers also began in 2013 and will continue for all designated new staff.

All direct consumer service delivery staff receive training on job placement and developing employer relationships. In addition, trainings focusing on living with spinal cord injury, coaching for engagement, and vocational assessment in school-to-work transition were provided.

In addition to the focus on technology in specific trainings, SCVRD has two in-house rehabilitation technology centers. Rehabilitation technology engineers provide training and support to staff, businesses and consumers as well as tours and presentations for the community. Rehabilitation technology engineers offer onsite services as well as services from the two regional locations. The agency also has a series of eight online training modules that focus on the identification of the need for rehabilitation technology services and application of those services.

Role-specific training is provided for all direct service delivery staff. Customer service, true colors training, ethics, disability awareness/etiquette, safety training, nonviolent intervention, panic alarm training, and a course on securing personally identifiable information are requirements for all employees.

Progress continues in building an online library of disability-specific modules which are available upon demand. These modules are interactive and competency based. As always, the impact of these training efforts on staff performance will be assessed and the recommendations considered for the improvement of future training programs. As prior training plans included training on the 1998 Rehabilitation Act, the current training plan will include objectives that focus on WIOA, informed choice, disability-specific trainings and transition.

SCVRD staff participate in relevant disability related conferences. These conferences offer current information on disabilities and initiatives in vocational rehabilitation.

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

Numerous local trainings take place and extensive research is conducted when planning these sessions in order to provide the most up-to-date information that will assist staff in providing quality services to consumers. When conducting disability-related trainings, SCVRD uses physicians, individuals who experience the specific disabilities and other experts who are current with the latest research in their field. For designated staff, the department sponsors attendance at graduate courses that provide information on cutting-edge initiatives in the field.

Executive staff is actively involved with the Council of State Administrators of Vocational Rehabilitation and the South Carolina Vocational Rehabilitation Association. Staff also subscribe to numerous professional and research journals.

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

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

SCVRD has current personnel recruitment and training policies that are reflective of the findings of the US Census Bureau, including the 2017 American Community Survey (ACS). This estimates that 27.0 percent of South Carolina's population identified themselves as African American. This number represents a 1 percent decrease since the 2010 ACS report. Additionally, 5.7 percent of South Carolina's population identified themselves as Latino or Hispanic, per the 2017 ACS, and the department sponsors Spanish classes for staff to facilitate communication with this minority group. Hiring incentives are also utilized for staff who are bilingual in English and Spanish, which has resulted in an increased number of staff who are bilingual. The remaining minority populations are distributed among Native Americans, Asian, or dual race.

In addition, the department continues to place emphasis on services for individuals who are deaf to ensure that a counselor in each area can communicate effectively. The department takes advantage of web-based trainings. In addition, weekly American Sign Language (ASL) classes are provided for Rehabilitation Counselor for the Deaf (RCD). The department has a certified interpreter on staff who provides video remote and on-site interpretation, as well as serving as a Consumer Services Specialist for this area of expertise. In addition, qualified interpreters are used if accessing a certified interpreter would delay service provision.

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

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

TASC is a robust state-level interagency collaborative that works in support of increasing positive postsecondary outcomes for students with disabilities. It has multiple stakeholder agencies and organizations, and supports local level interagency teams through training, technical assistance, and strategic planning.

The department continues to coordinate the development of designated staff with emerging initiatives by the SCDE and the 81 local school districts (LEAs) under IDEA and state school-to-work transition efforts. Transition training efforts included the following: a two-day transition summer series was conducted for transition staff that included presentations and training on Pre-Employment Transition Services, vocational assessment, use of ACT and Work Keys assessments, referral development, best

practices, documentation and use of school records, work experiences, using O\*Net, and postsecondary training. Selected transition staff participated in a session on active training techniques and self-determination. Over 40 transition staff participated in an annual interagency transition conference, focused on local interagency planning and content sessions focused on effective service delivery for students with disabilities. Youth leaders also participated in the conference. Disability-specific modules on learning disabilities, intellectual disabilities and autism spectrum disorders are available for all staff via LOTIS, the agency's online training site. In addition to the disability-specific training modules, a module on transition basics, with a focus on evidence-based practices and quality service delivery, has been developed and is delivered in person to all SCVRD transition personnel. This has become the standard training for all new staff working with transition students. The agency continues to work collaboratively with the SCDE to provide training as a component of their State Personnel Development Grant - Project Gateway. In addition, selected transition staff participate in training on transition assessment and facilitating work experiences offered through the SCDE's annual research to practice training.

The TSS/TSC collaborative approach to the provision of transition services was continued this year in five schools. This approach designates a transition services specialist – who is a school district employee – or a designated VR counselor, to act as a liaison to refer students to the department and assist these students in participating in transition activities and work-based experiences in the community. This outreach effort has improved access to VR services for students with disabilities in the areas in which the program is operating and has increased our collaborative efforts with the local school district.

The department continues to designate a liaison counselor who provides Pre-Employment Transition Services to each public secondary school throughout the state. During this past year state office and local staff have provided in-service training to school staff, parents, and students regarding service availability. Also, cooperative agreements with DJJ and the Will Lou Gray Opportunity School afford the ability to work collaboratively to serve at-risk youth prior to their exit from high school.

### *j. Statewide Assessment*

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

A. With the most significant disabilities, including their need for supported employment services;

SCVRD designs new initiatives, enhances existing programs, and refines policies and procedures based on many factors. This includes continuous program assessment and evaluation by analyzing statistical trends and utilizing input from constituency groups. In keeping with SCVRD's strategic plan and, as specified by the Rehabilitation Act, as amended, this feedback loop begins with the CSNA completed in October 2019.

A variety of source information is used, including information from the United States Census Bureau's American Community Survey (ACS), Rehabilitation Services Administration (RSA), Cornell University Employment and Disability Institute (EDI), Bureau of Labor and Statistics (BLS), US Centers for Disease Control (CDC), and the Social Security Administration (SSA). SCVRD conducts ongoing internal and external customer satisfaction surveys and uses this information to strengthen service delivery.

South Carolina's unemployment rate has changed from 5.6 percent in 2014 to 3.4 percent in 2019 (Bureau of Labor Statistics, BLS Local Area Unemployment Statistics). Although the unemployment rate has substantially decreased, the gap in employment rates for individuals with disabilities remains large. In 2017, the employment-to-population ratio for people with disabilities was 35.5 percent, and the employment-to-population ratio for individuals without

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disabilities was 76.5 percent, amounting to an employment gap of 41 percentage points (2018 Annual Report on People with Disabilities in America, 2018 Annual Report). In South Carolina, the employment-to-population ratio for people with disabilities was 32.6 percent, and the employment-to-population ratio for individuals without disabilities was 76.2 percent, reflecting an employment gap of 43.6 percentage points. As of 2017, there were 376,889 individuals with disabilities aged 18-64 living in the community in South Carolina (2018 Disability Statistics Compendium, 2018 Annual Disability Statistics Compendium). Total population in South Carolina in 2017 was 5,024,369. Population by race reflected the following totals: White alone: 3,380,219, Black or African American alone: 1,357,385, American Indian and Alaska Native alone: 15,007, Asian alone: 76,181, Native Hawaiian and Other Pacific Islander alone: 6,389, Some other race alone: 81,959, Two or more races: 107,229 (ACS 1-year estimates, 2017 Table B02001, ACS 2017 1-year estimates B02001). In comparison, those served through SCVRD in SFY 2018 reflected the following: 46.3 percent white, 49.6 percent African American, 0.8 percent Native American, 0.5 percent Asian, 0.4 percent Native Hawaiian and Other Pacific Islander and 2.5 percent Hispanic or Latino.

### *Youth with Disabilities*

Given the emphasis on services for students and youth in WIOA, Table 1 below highlights the number of youth with disabilities in transition. This data, from the 2017 American Community Survey (ACS) retrieved from Cornell University Disability Statistics website [www.disabilitystatistics.org](http://www.disabilitystatistics.org), cites the prevalence of disability among non-institutionalized people ages 16 to 20 in South Carolina.

TABLE 1	ANY DISABILITY	VISUAL	HEARING	AMBULATORY	COGNITIVE	SELF-CARE	INDEPENDENT LIVING
TOTAL NUMBERS REPORTED	19,600	3,500	2,800	3,200	12,400	2,300	7,900
PERCENTAGE	5.6%	1.0%	0.8%	0.9%	3.6%	0.7%	2.3%

Table 2 reflects the range of disabilities among working age people. This data, from Cornell University, cites the prevalence of disability among non-institutionalized people ages 21 to 64 in South Carolina in 2017.

TABLE 2	ANY DISABILITY	VISUAL	HEARING	AMBULATORY	COGNITIVE	SELF-CARE	INDEPENDENT LIVING
TOTAL NUMBERS REPORTED	363,900	74,900	62,400	192,100	141,900	63,200	126,900
PERCENTAGE	13%	2.7%	2.2%	6.9%	5.1%	2.3%	4.5%

### *Labor Force Participation Rates by Disability Type*

Table 3 (data retrieved from Cornell University) illustrates employment rates of non-institutionalized working age people by disability status in South Carolina in 2017.

TABLE 3	ANY DISABILITY	VISUAL	HEARING	AMBULATORY	COGNITIVE	SELF-CARE	INDEPENDENT LIVING
TOTAL NUMBERS REPORTED	119,900	32,700	33,000	40,500	36,100	6,900	13,900
PERCENTAGE	33.0%	43.6%	53%	21.1%	25.4%	10.9%	11.0%

Table 4 (data retrieved from Cornell University) illustrates the number and percentage of non-institutionalized persons aged 21 to 64 with a disability who were not working, but actively looking for work in 2017.

TABLE 4	ANY DISABILITY	VISUAL	HEARING	AMBULATORY	COGNITIVE	SELF-CARE	INDEPENDENT LIVING
TOTAL NUMBERS REPORTED	17,500	4,500	3,300	5,600	9,000	1,600	5,800
PERCENTAGE	7.2%	10.7%	11.2%	3.7%	8.5%	2.8%	5.1%

### SSI/SSDI Recipients

According to the Social Security Administration 174,597 South Carolinians received Social Security Disability Insurance (SSDI) in 2017 (SSA OASDI Beneficiaries by State and Zip Code, 2017). There were 63,200 individuals ages 21 to 64 in South Carolina that received Supplemental Security Income (SSI) (ACS 2017 retrieved from Cornell University Disability Statistics website: [www.disabilitystatistics.org](http://www.disabilitystatistics.org) ). In 2017, there were 20,247 individuals aged 18 to 64 who received both SSDI and SSI based on disability (SSA Recipients of Social Security, SSI, or both). This reflects a substantial talent pool of individuals with barriers to employment. These individuals may not be reflected in the totals for unemployed as many of these individuals may not be actively seeking work or have never worked (SSA).

The provision of early intervention services is a major issue given the long application process associated with making eligibility determinations for both the SSI and SSDI programs. There will be a need for increased supported employment services to improve the employment outcomes of many SSI/SSDI recipients. As a total count, the number of SSI/SSDI recipients who are currently receiving services by SCVRD is 4,101 as of June 2019.

### *Individuals who are Deaf or Hard of Hearing*

During SFY 2018, SCVRD served 663 persons with a hearing disability (count of referrals determined eligible or evaluated with Trial Work Experience plan) which represents a 43% increase since SFY 2015. South Carolina has a prevalence of hearing impairments of 2.1 percent of the population, or 63,700, aged 18-64 (ACS 2017 retrieved from Cornell University Disability Statistics website: [www.disabilitystatistics.org](http://www.disabilitystatistics.org) ). The South Carolina Association of the Deaf (SCAD) has identified numerous resources for SCVRD counselor use since collaboration began in May of 2012. SCVRD has continued outreach and increased services to individuals that are deaf or hard of hearing.

*Emerging Disabilities*

The increased need for services for individuals from identified emerging disabilities was identified in this needs assessment.

According to the Centers for Disease Control and Prevention, the prevalence of Autism Spectrum Disorder (ASD) continued to increase with one in fifty-nine children identified with ASD nationally based on a 2014 sample of 8 year-olds from communities in the CDC's Autism Data and Developmental Disabilities Monitoring Network. The Special Education Child Count estimates for overall ASD prevalence in South Carolina in 2016 were 9.6 per 1,000 children, reflecting an increase from 1.3 per 1,000 children in the year 2000 (CDC autism data visualization tool, retrieved 6/24/19: CDC ASD Homepage Data & Statistics).

The National Center for Health Statistics (NCHS Data Brief No. 291, November 2017, retrieved 6/24/19: NCHS Data Brief 291) indicates that during 2014 – 2016, the prevalence of children diagnosed with any development disability significantly increased from 5.76% to 6.99%.

Students and youth with intellectual/developmental disabilities and multiple disabilities continue to need specific services from SCVRD. Of the current students SCVRD served in June 2019, 80% were identified as having a cognitive impairment. During SFY 2018, SCVRD served 596 individuals with Intellectual Disability (count of referrals determined eligible or evaluated with Trial Work Experience plan). Providing vocational rehabilitation services to students and youth with the most significant or multiple disabilities, including Pre-Employment Transition Services and supported employment services, is an area of focus for SCVRD.

Another area of identified need is response to the increase of traumatic brain injuries (TBI) through outreach and a focus on serving more individuals with brain injuries. This includes the general population as well as veterans. According to the Brain Injury Association of South Carolina, 61,000 South Carolinians have a TBI-related disability (Brain Injury Association of SC, retrieved 6/24/19, <http://www.biafsc.com/resources.htm#Facts>).

The number of TBI-related emergency department visits, hospitalizations, and deaths in the general population in the US has increased 53% from 2006 (approximately 1.88 million) to 2014 (approximately 2.88 million) according to the CDC (CDC TBI Data and Statistics). The Department of Defense estimates that 22% of all combat casualties from Iraq and Afghanistan are brain injuries (U.S. Department of Veterans Affairs, retrieved 6/24/19: DVA Office of Research & Development TBI).

Data from the 2017 ACS shows that in South Carolina an estimated 28.2% of veterans aged 21 to 64 (52,500) reported a VA service-connected disability (retrieved from Cornell University Disability Statistics website: [www.disabilitystatistics.org](http://www.disabilitystatistics.org)). The prevalence of traumatic brain injuries in the veteran population created a shift in the mission of the Defense and Veteran Brain Injury Center (DVBIC). DVBIC's efforts are focused on state-of-the-science care from point-of-injury to reintegration for service members, veterans, and their families to prevent and mitigate consequences of mild to severe TBI. In South Carolina, SCVRD has been an active member of the Veterans Policy Academy since the summer of 2008 and continues to collaborate with the other agencies/entities to address the service needs of veterans with disabilities to ensure their return to the workforce.

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According to the Spinal Cord Injury (SCI) Statistical Center (2019 SCI Data Sheet, retrieved 6/24/19, NSCISC 2019 Data Sheet), the annual incidence of SCI is approximately 54 cases per one million people, or about 17,730 new SCI cases each year. Since 2015, 17% of persons with SCI are employed at year 1 post-injury. SCVRD is actively pursuing strategies to increase outreach to this group through collaboration with the Spinal Cord Injury Association of South Carolina and other interested groups.

SCVRD's ongoing focus on outreach to individuals with most significant disabilities results in a sustained need for supported employment services in South Carolina. Through efforts to make Pre-Employment Transition Services (Pre-ETS) available to all potentially eligible students, this results in increased interaction and service provision for students with ASD, ID/DD, students who are deaf, and students with significant or most significant physical disabilities who may not have previously considered competitive, integrated employment as a post-school outcome. Through collaborative work with the Department of Disabilities and Special Needs, the Developmental Disabilities Council, Centers for Independent Living and the Disability Employment Coalition, identification and outreach to individuals requiring supported employment services is increasing. This is also in conjunction with the state's Employment First initiative, which seeks to ensure that the first option for all individuals with disabilities who want to work is competitive, integrated employment. SCVRD has a longstanding partnership with the SC Department of Mental Health and provides services collaboratively using the Individualized Placement and Supports (IPS) model for consumers with severe and persistent mental illness. The number of IPS programs and locations across the state will be expanding in SFY 2020.

Data show that the percentage of all consumers who received supported employment services were as follows:

TABLE 5

	FFY 2015	FFY 2016	FFY 2017*	SFY 2018
RECEIVING SUPPORTED EMPLOYMENT SERVICES	7.7%	6.9%	6.2%	6.2%

\*FFY 2017 data collection represents a 9-month period. New data collection requirements were implemented 7-1-17 for the RSA-911 Federal Case Services Report.

TABLE 6

	FFY 2015	FFY 2016	FFY 2017*	SFY 2018
RECEIVING SUPPORTED EMPLOYMENT SERVICES	14.0%	13.0%	13.1%	13.6%

### B. Who are minorities;

According to 2017 US Census Bureau estimates, South Carolina remains a state with a large minority population. Total population in South Carolina in 2017 was 5,024,369. Population by race reflected the following totals: White alone: 3,380,219 (67%), Black or African American alone: 1,357,385 (27%), American Indian and Alaska Native alone: 15,007 (0.3%), Asian alone: 76,181 (1.5%), Native Hawaiian and Other Pacific Islander alone: 6,389 (0.13%), Some other race alone: 81,959 (1.6%), Two or more races: 107,229 (2.1%) (ACS 1-year estimates, 2017 Table B02001, ACS 2017 1-year estimates B02001). The population in South Carolina that was Hispanic or Latino in 2017 was 285,990 (5.7%) (ACS 1-year estimates, 2017 Table B03003). South Carolinians have a 14.7 percent rate of disability. By race, prevalence estimates of disability in 2017 were as follows: White 14.8%, Black or African American 15.5%, Native American or Alaska Native 21.6%, Asian 6.3%, and Some Other Race(s) 10.7%. The rate for Hispanic and Latino

individuals is 7.3%. (Retrieved from Cornell University Disability Statistics website: [www.disabilitystatistics.org](http://www.disabilitystatistics.org)).

In comparison, individuals served through SCVRD in SFY 2018 reflected the following: 46.3 percent white, 49.6 percent African American, 0.8 percent Native American, 0.5 percent Asian, 0.4 percent Native Hawaiian and Other Pacific Islander and 2.5 percent Hispanic or Latino.

Historically, SCVRD exceeded the performance level for service to minorities (RSA Minority Service Rate). The ratio for minorities to non-minorities was .952 in 2014 and .967 through December 2015. These ratios indicate that minority populations are proportionately represented among the individuals who receive SCVRD services.

#### *African American Population*

In the 2017 estimates from the US Census Bureau's ACS, 27 percent of South Carolina's population identified themselves as African American. This number represents a 1 percent decrease since the 2010 ACS report. Of the 1.3 million African Americans living in South Carolina, 15.5 percent of persons report having a disability. This is a higher percentage than in the population at large where 14.7 percent of persons report have a disability (retrieved from Cornell University Disability Statistics website: [www.disabilitystatistics.org](http://www.disabilitystatistics.org)).

#### *Native American Population*

According to the 2017 ACS, 15,007 South Carolinians identified themselves as being "American Indian and Alaska Native." This number represents minimal growth (0.03%) since the 2010 US Census, and constitutes less than 1 percent of the state's total population.

This population (American Indian and Alaska Native) has the highest incidence of disability among demographic groups in South Carolina with 21.6% percent identified with one disability. This is high even when compared with the national average of 15.9 percent of Native Americans with a disability. In SFY 2018, 0.8% percent of individuals that received services from SCVRD identified themselves as Native Americans, an increase from 0.4% in SFY 2017.

Since the American Indian Vocational Rehabilitation Services (AIVRS) grant is not awarded in South Carolina, awareness of public VR services may be low for Native Americans in the state. Efforts to increase the number of Native Americans who seek and participate in SCVRD services will continue through outreach in communities where significant numbers of Native Americans live.

#### *Latino/Hispanic Population*

Individuals who identified themselves as Latino or Hispanic comprised 2.5 percent of SCVRD consumers in SFY 2018. Population totals in 2017 indicate that 5.7% of the population in South Carolina identify as Hispanic or Latino. An increase in the number of individuals with disabilities in Hispanic and Latino communities seeking vocational rehabilitation services is anticipated. This represents an opportunity to continue strategies to ensure this population is actively served.

### C. Who have been unserved or underserved by the VR program;

#### *Older Adults*

In 2017, an estimated 25.1 percent of individuals ages 65 - 74 in the US reporting having a disability. In South Carolina, this was 26.7% of the population, or 142,700 individuals (Disability statistics from the ACS retrieved from Cornell University Disability Statistics

website: [www.disabilitystatistics.org](http://www.disabilitystatistics.org) ). In SFY 2018, SCVRD provided services to 711 persons aged 65 and older at application.

#### *Veterans*

According to the ACS (2017), there are 52,500 veterans aged 21 to 64 with a service-connected disability in South Carolina (Disability statistics from the ACS retrieved from Cornell University Disability Statistics website: [www.disabilitystatistics.org](http://www.disabilitystatistics.org) ). As of 2017, the ACS estimated that 9.3 percent of the civilian population were veterans (361,803) (ACS 2017 Table S0201, 1-year estimates).

SCVRD provides services to veterans with disabilities; and, efforts to increase outreach to this population are ongoing. In SFY 2018, SCVRD served 1,516 consumers identified as veterans. SCVRD has established relationships with local employers in all areas of the state, and collaboration with the Veterans Administration is essential to providing the greatest outreach for veterans with disabilities. SCVRD has designated counselors in many locations to work with local VA offices for referrals.

#### *Rural Population*

SCVRD has long established the maximum distance a client should have to travel to obtain SCVRD services is 50 miles. This provides ample coverage statewide to all individuals with disabilities who wish to apply for services. However, according to US Census data in 2010, 33.7 percent of the population in South Carolina lives in rural areas compared to 19.2% of the U.S. population (American Fact Finder, Urban and Rural Universe, Total Population 2010 Census Summary File 1). The rural nature of the state lends itself to minimal transit services. Seven out of the 46 counties do not have any type of public transportation (SC MTP Transit Plan, August 2014). The lack of transportation creates an additional barrier for individuals to participate in vocational rehabilitation services and enter the work force. Therefore, SCVRD continues to develop partnerships and methods to ameliorate this barrier.

One such area is the Oconee Pickens office located in Seneca. According to the 2010 Census, (American Fact Finder, P2, Urban and Rural Total Population 2010 Census Summary File 1), the population for Oconee county is 65% rural and Pickens county is 36% rural. With the need to expand capacity for services to reach consumers in this rural setting and bring necessary training services to meet the needs of consumers, business, and industry for customized and demand-driven training, expansion of the existing facility in Seneca is necessary. Although an area analysis shows that an adequate proportion of the community is being served compared to state percentages, the need for space to house staff and to expand training opportunities is established through this needs assessment. The greater upstate region of South Carolina has identified industry sectors with significant skill gaps and workforce development needs that can be met through further development of customized and demand driven training offered through the SCVRD Work Training Center in conjunction with industry and education partners. Further discussion on the needs in Seneca is included in section 2, identification of needs to establish, develop, or improve the community rehabilitation programs within the State.

#### *Disability Types*

SCVRD analyzed service provision to consumers by disability categories to assess whether SCVRD successfully served all groups and to establish disability categories that call for more emphasis. The analysis compared four years (FFY 2015- SFY 2018) of SCVRD data focused upon employment outcomes by disabilities. (2011 is the last year

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RSA published agency report cards. The most recent comparative data available from RSA is from FFY 2013. FFY 2017 data reflects a 9-month period.)

DISABILITY TYPE	FFY 2015 COUNT	FFY 2015 PERCENT OF TOTAL	FFY 2016 COUNT	FFY 2016 PERCENT OF TOTAL	FFY 2017* COUNT	FFY 2017* PERCENT OF TOTAL	SFY 2018 COUNT	SFY 2018 PERCENT OF TOTAL
VISUAL - INDIVIDUALS SERVED	22	0.198%	26	0.228%	33	0.352%	25	0.222%
AUDITORY AND COMMUNICATIVE - INDIVIDUALS SERVED	576	5.178%	583	5.119%	495	5.278%	670	5.951%
PHYSICAL - INDIVIDUALS SERVED	2494	22.422%	2863	25.136%	2345	25.003%	2988	26.541%
INTELLECTUAL AND LEARNING DISABILITY - INDIVIDUALS SERVED	2564	23.051%	2566	22.529%	2010	21.431%	2450	21.762%
PSYCHOSOCIAL AND PSYCHOLOGICAL - INDIVIDUALS SERVED	5467	49.150%	5351	46.978%	4496	47.937%	5125	45.523%
VISUAL	15	68.182%	18	69.231%	26	78.788%	15	60.000%
AUDITORY AND COMMUNICATIVE	454	78.820%	451	77.359%	390	78.788%	519	77.463%
PHYSICAL	1706	68.404%	1945	67.936%	1489	63.497%	2004	67.068%
INTELLECTUAL AND LEARNING	1455	56.747%	1407	54.832%	976	48.557%	1285	52.449%
PSYCHOSOCIAL AND PSYCHOLOGICAL	3076	27.654%	2985	26.207%	2293	24.448%	2782	24.711%
VISUAL - INDIVIDUALS SERVED	5	0.160%	8	0.254%	7	0.282%	2	0.066%
AUDITORY AND COMMUNICATIVE - INDIVIDUALS SERVED	75	2.398%	88	2.794%	72	2.904%	95	3.148%
PHYSICAL - INDIVIDUALS SERVED	168	5.373%	213	6.762%	165	6.656%	185	6.130%

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DISABILITY TYPE	FFY 2015 COUNT	FFY 2015 PERCENT OF TOTAL	FFY 2016 COUNT	FFY 2016 PERCENT OF TOTAL	FFY 2017* COUNT	FFY 2017* PERCENT OF TOTAL	SFY 2018 COUNT	SFY 2018 PERCENT OF TOTAL
INTELLECTUAL AND LEARNING DISABILITY - INDIVIDUALS SERVED	2093	66.933%	2049	65.048%	1604	64.704%	1962	65.010%
PSYCHOSOCIAL AND PSYCHOLOGICAL - INDIVIDUALS SERVED	786	25.136%	792	25.143%	631	25.454%	774	25.646%
VISUAL	3	60.000%	5	62.500%	5	71.429%	0	0.000%
AUDITORY AND COMMUNICATIVE	44	58.667%	55	62.500%	42	58.333%	60	63.158%
PHYSICAL	96	57.143%	121	56.808%	90	54.546%	97	52.432%
INTELLECTUAL AND LEARNING	1158	55.327%	1100	53.685%	747	46.571%	989	50.408%
PSYCHOSOCIAL AND PSYCHOLOGICAL	426	13.623%	371	11.778%	269	10.851%	347	11.498%

Internal data for 2015 – 2018 further break down the types of disabilities served and reflects the following trends for consumer intake by cause and impairment code (individuals determined eligible or with a Trial Work Experience plan):

- High rates of service for individuals with mental impairments, including drug and alcohol addiction, which have remained stable over the past four years.
- An increase in individuals with ADHD, Autism Spectrum Disorder and Specific Learning Disabilities from SFY 2015 to SFY 2018.
- An increase in individuals who are deaf or hard of hearing from SFY 2015 to SFY 2018.
- Relatively low rates of service for individuals with spinal cord injury, respiratory impairments, stroke and traumatic brain injury, and neurological impairments.

By source of referral, in SFY 2018 SCVRD received the majority of referrals from self-referrals (23.81%), secondary educational institutions (15.94%), Department of Corrections and Department of Juvenile Justice (14.19%), and mental health providers (12.66%).

### *Individuals Served Analysis*

Data shows that SCVRD serves individuals with psychosocial and psychological disabilities at a high rate (47.9% of all consumers in FFY 2017), but at a lower rate for consumers less than 25 (25.5% in FFY 2017). The relatively low percentage of individuals with visual impairments served is expected, as the South Carolina Commission for the Blind serves individuals with primary visual impairments. Services for individuals with intellectual disabilities have been an area of focus for SCVRD, and the percentage of consumers served with intellectual and learning disability reflect this

(21.4% of all consumers and 64.7% of consumers aged less than 25 years). Strategies to improve outreach to individuals with physical disabilities have resulted in an increase in percentage served (22.4% in FFY 2015 and 25% in FFY 2017), although strategies are needed for outreach to individuals with physical disabilities such as spinal cord injury, traumatic brain injury and neurological impairment. For youth (age less than 25), individuals with intellectual and learning disabilities comprise the majority of consumers (64.7%). SCVRD will need to formalize strategies for outreach for youth with physical disabilities (6.6%) and auditory and communicative disabilities (2.9%).

#### ***Employment Rate Analysis***

The employment rate for all consumers was 41.9% in FFY 2015, 42.9% in FFY 2016, and 40.3% in FFY 2017. Employment rates were highest for consumers with visual, auditory and communicative, and physical disabilities. Lower rates of employment were evident for individuals with psychosocial and psychological disabilities. Internal data for SFY 2018 reflects highest success rates (proportion of all closures in competitive, integrated employment including individuals determined eligible but exited prior to Individualized Plan for Employment) for individuals who are deaf and hard of hearing (73%), "Other" impairments (65%), and physical impairments (56%). Lower rates of success were evident for individuals with spinal cord injury (33%), stroke and traumatic brain injury (40%) and drug and alcohol abuse (40%).

#### **D. Who have been served through other components of the statewide workforce development system; and**

Referrals from the workforce development system reflect an opportunity for improvement, with 1.5% of referrals from SC Works and State Employment Agency (American Job Centers), and 0.6% of referrals from Adult Education. Data collection on co-enrollment in WIOA programs began 7-1-17. SCVRD reported 10.8% of participants enrolled in more than one core program for PY 2018/SFY 2019.

#### **E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.**

Under the Workforce Innovation and Opportunity Act (WIOA), provision of pre-employment transition services (Pre-ETS) is required for eligible and potentially eligible students with disabilities. WIOA further defines these as required activities: job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs, workplace readiness training, and instruction in self-advocacy. The five required Pre-ETS align with the existing framework for school-to-work transition services that the South Carolina Vocational Rehabilitation Department (SCVRD) has employed for many years, based on the National Collaborative on Workforce and Disability for Youth's (NCWD/Y) Guideposts for Success evidence-based model. SCVRD initiated a renewed focus on services for students and youth with disabilities several years prior to the passage of WIOA. In addition to the dedicated resources and focus on services for this population, WIOA also outlines additional requirements.

#### ***Need for Pre-Employment Transition Services***

**SC Department of Education**

State agencies, including both VR and Education agencies, in South Carolina are required to submit an annual Accountability Report. The 2016-17 Annual Accountability Report of the SC Department of Education (SCDE) indicated that the SCDE is in the process of developing a merged accountability system that blends state and federal

requirements. The state has developed their Every Student Succeeds Act (ESSA) plan over the past two years, which was pending submission to the Department of Education at the time of the Accountability Report for 2016-17.

According to the SCDE Accountability Report Performance Measure Template, the percentage of schools complying with postsecondary transition goals and services of students with an Individualized Education Plan (IEP) was 95.3% for 2016 - 2017, with a goal of 95%.

According to the most recent school report card information from the SC Department of Education, in 2017 there were 27,306 students served under an IEP in public high schools in South Carolina. (SC Dept. of Education Report Cards, 2017)<sup>1</sup>.

#### **IDEA Part B data – US Department of Education**

In addition to state level reports, the Department of Education (the Department) provides an annual report to Congress on implementation of the Individuals with Disabilities Education Act (IDEA).<sup>2</sup> IDEA part B refers to services provided for students with disabilities age six through 21. In South Carolina in 2014, 9% of the population ages six through 21 were served under IDEA, a decrease of 1.7% from 2008. The national rate was 8.8% in 2014. For South Carolina, the percentage of students by educational environment were as follows: 58.3% were in regular class 80% or more of day; 21.3% in regular class 40% - 79% of day; 17.8% in regular class less than 40% of day. This may have implications for SCVRD service delivery strategies within the schools.

The percentage of students age 14 – 21 exiting IDEA part B and school who graduated with regular high school diploma (all disabilities) in South Carolina was 45.7% in 2014, up from 40.4% in 2004.

The dropout percentages for students age 14 - 21 (all disabilities) in South Carolina were 40.5% in 2014 compared to 52.5% in 2004. South Carolina was one of three states in which more than 40% dropped out, which bears consideration for development of effective strategies to curb dropout rates and encourage engagement in pre-employment transition and other transition services. The percentage of students age 14 through 21 exiting IDEA part B for 2013-14 in South Carolina by exit reason were as follows:

<b>GRADUATED WITH A REGULAR DIPLOMA</b>	26.9%
<b>RECEIVED A CERTIFICATE</b>	5.0%
<b>DROPPED OUT</b>	23.8%
<b>REACHED MAXIMUM AGE</b>	2.8%
<b>DIED</b>	0.2%
<b>TRANSFERRED TO REGULAR EDUCATION</b>	7.4%
<b>MOVED, KNOWN TO BE CONTINUING</b>	33.9%

According to the US Department of Education IDEA data, specific learning disability, speech or language impairment, and intellectual disability were the top three types of disabilities for students served under IDEA.

DIAGNOSTIC CATEGORY	FALL 2015 COUNT
ALL DISABILITIES	92,344
SPECIFIC LEARNING DISABILITY	41,809
SPEECH OR LANGUAGE IMPAIRMENT	14,595
INTELLECTUAL DISABILITY	6,446
EMOTIONAL DISTURBANCE	2,418
MULTIPLE DISABILITY	1,186
HEARING IMPAIRMENT	971
ORTHOPEDIC IMPAIRMENT	486
OTHER HEALTH IMPAIRMENT	12,994
VISUAL IMPAIRMENT	400
AUTISM	6,460
DEAF BLINDNESS	12
TRAUMATIC BRAIN INJURY	188
DEVELOPMENTAL DELAY	4,379

Source: 2017 Annual Disability Statistics Compendium

### Students and Youth with Disabilities in SCVRD

Data from the 2015 RSA 911 data file for SCVRD was reviewed. This shows that 24.6% of cases closed were age 21 or younger at application (n=3939). For individuals that were 21 or younger, 2,370 were coded as a student with a disability at application, representing 14.8% of all closures. Four hundred individuals (2.5% of closures) that were younger than 19 were not coded as a student with a disability in secondary education at application, and could be considered to represent individuals that had dropped out of school.

Types of closures were compared based on these categories: transition students (21 or younger and student in secondary education), dropouts (younger than 19 and not a student in secondary education) and adults/other. The rate of employment outcomes were lower for dropouts (35.8%) than for transition students (42.2%) and adults/other (42%). The adjusted rehabilitation rates were also lower for transition students and dropouts.

CONSUMER CATEGORY	TOTAL	CLOSED BEFORE DETERMINED ELIGIBLE	DETERMINED ELIGIBLE, NO IPE OR PRE-SERVICE WITH IPE	SERVICES INITIATED, NOT EMPLOYED	EMPLOYMENT OUTCOME	ADJUSTED REHAB RATE
TRANSITION STUDENT	2,370	7.6%	9.4%	40.8%	42.2%	50.9%
DROPOUT	400	12.0%	22.0%	30.3%	35.8%	54.2%

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CONSUMER CATEGORY	TOTAL	CLOSED BEFORE DETERMINED ELIGIBLE	DETERMINED ELIGIBLE, NO IPE OR PRE-SERVICE WITH IPE	SERVICES INITIATED, NOT EMPLOYED	EMPLOYMENT OUTCOME	ADJUSTED REHAB RATE
ADULTS OR OTHER	13,232	14.2%	18.6%	25.2%	42.0%	62.6%
TOTAL	16,002	13.1%	17.3%	27.6%	41.9%	60.3%

Primary disability impairment and cause data were also evaluated. This shows that the highest primary impairment was cognitive impairments for transition students (79.1%) and dropouts (46.8%). The second highest was psychosocial impairments for both groups (8.2% for transition students and 21.5% for dropouts). In terms of primary disability cause, the highest for transition students was specific learning disabilities (48.6%) followed by intellectual disability (14.5%). For dropouts, both attention-deficit hyperactivity disorders and specific learning disabilities were highest (19% for both), with depressive and mood disorders next (9.8%).

Pre-ETS are delivered by SCVRD primarily through dedicated school-to-work transition counselors and transition coaches. There are transition counselors assigned to every public high school in the state, including at the state Department of Juvenile Justice facility. Counselors work collaboratively with local education agency staff to identify students with disabilities. They are located on-site in the high schools and establish a schedule through which individualized and group Pre-ETS are provided. These services are made available to all students, including potentially eligible students. VR transition counselors enlist the assistance of teachers, guidance counselors, school nurses, school transition coordinators/specialists and school job coaches to ensure that students with many different types of disabilities are made aware of the available Pre-ETS. This includes students with IEPs, students with 504 plans, and students with disabilities that may not have either but would meet the requirements to have a 504 plan. Students with most significant disabilities who require supported employment services and supports that are more intensive are identified and referred to appropriate staff for provision of Pre-ETS. Workplace readiness training and work-based learning experiences are provided both in the schools and in the community, as well as through SCVRD's work training centers located throughout the state. In many locations, schools transport students to the work training centers during the school day. This training provides a foundation from which students can move on to community based work experiences, internships, and other job exploration and work readiness training activities.

Transition counselors present information on Pre-ETS at teacher trainings and administrative meetings, school assemblies, parent night events, and resource fairs. In addition, The Transition Alliance of South Carolina (TASC) is an interagency collaborative whose mission is to increase successful student post-secondary transition outcomes through active interagency collaboration. Their efforts help build capacity for transition programming at the state level, while also serving as a bridge to local communities. Through their support, 61 local interagency transition teams have been established. These teams are another avenue for making stakeholders aware of the availability of Pre-ETS.

It is clear that there are opportunities for improvement in achievement of outcomes for school to work transition services. Given the array of stakeholders involved in the provision of Pre-ETS and other services for students and youth, it is important to seek periodic feedback from individuals involved in the provision of services to students about the current observation and for improved services and outcomes.

### LEA Partner Survey

Expanding the data gathered from school-to-work transition stakeholders was a focus of this CSNA. This was achieved by developing and deploying a survey of LEA staff to obtain information on the level of knowledge of VR Pre-ETS, views on the working relationships with SCVRD transition staff, input on the effectiveness of VR transition services, and recommendations for improvement of transition services provided by SCVRD.

### Methods

A survey was designed and deployed through the TASC transition listserv to obtain data on the current views of LEA staff. The survey request was sent via email as well as in a follow up link included in the TASC newsletter. The survey asked LEA staff to respond to questions regarding their familiarity with roles and responsibilities of VR staff, compared to school staff. It also asked for responses regarding familiarity with Pre-ETS, coordination of transition activities between VR and school staff, effectiveness of the working relationship between LEA and VR staff, typical age of referral to VR, effectiveness and level of availability of Pre-ETS in the district or community.

The survey used for this project was developed based on input from SCVRD staff, including transition coordinator and specialist staff, as well as individuals with expertise in survey research and design. Qualitative and quantitative data points were included. The survey instrument included scaled questions (strongly agree, agree, disagree, strongly disagree) to address familiarity with roles and responsibilities of VR staff, coordination of Pre-ETS provided by VR with school transition curriculum, and effectiveness of working relationships. Questions were also designed to obtain responses on age of referral to VR, frequency of meetings with VR staff, which services were felt to be most effective in preparing students, and the level of availability of services. Open-ended questions were included to identify barriers to collaboration on transition services and recommended improvements to strengthen transition services.

The survey was distributed in electronic format via a listserv that includes a subscriber total of 1,349. This transition listserv includes a diverse group of stakeholders that are involved in school-to-work transition. The request for survey participation was sent via email and identified as a Survey for LEA Partners, a group that represent a subset of the entire subscriber total. After the initial email notification, an additional notice was included in the quarterly TASC transition newsletter approximately one month later. The survey remained open for a total of 2 months before results were compiled.

There were 25 respondents to the LEA survey, out of 1,329 subscribers on the transition listserv. Not all subscribers on the listserv would have been LEA staff. The respondents to the survey identified their respective school districts as well as their role within the LEA. There were 20 different school districts represented in the survey responses – out of the 81 school districts in South Carolina at the time of the survey that represents a 24.6% response rate. The districts represented all regions within the state, and included a mixture of large, urban districts as well as small, rural districts. The districts

included: Richland One, Chesterfield County, Lexington-Richland Five, Various Schools in Charleston/Dorchester/ Williamsburg/Berkeley/Orangeburg Counties, Berkeley, Spartanburg Five, Greenville County, Richland Two, Bamberg One, Calhoun County, Greenwood Fifty, Kershaw County, Spartanburg Six, Allendale, Dorchester Two, Spartanburg 1-7, Lexington Four, and Edgefield County. Five districts had multiple respondents.

Results from the survey were analyzed and grouped by theme. Strategies to address unmet needs or to replicate effective practices were identified as part of the final report.

### Results

ROLE	COUNT	PERCENTAGE OF RESPONDENTS
LEADERSHIP (SUPERINTENDENT, ASSISTANT SUPERINTENDENT, PRINCIPAL, ASSISTANT PRINCIPAL)	4	16%
DIRECT PROVIDER (TEACHER, TEACHER AIDE, JOB COACH)	9	36%
TRANSITION COORDINATOR/SPECIALIST	6	24%
OTHER	6	24%

Among the "Other" category, this included responses from Independent Living Center staff that provide skills workshops in the schools, compliance specialist, disability board member providing long-term support service, VR counselor, and transition teacher. All 25 respondents answered all of the following questions.

### Analysis of Quantitative Data

STRONGLY AGREE	60.00%
AGREE	28.00%
DISAGREE	12.00%
STRONGLY DISAGREE	0.00%

The survey results indicate a high level of familiarity with roles and responsibilities of VR staff with regard to school-to-work transition services (88% either strongly agree or agree that they are familiar). An additional question indicated a high rate of familiarity with pre-employment transition services (84% either strongly agree or agree), which is of critical importance given the mandates for provision of Pre-ETS contained within the Workforce Innovation and Opportunity Act (WIOA). This indicates that communication at the local level is occurring.

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<b>STRONGLY AGREE</b>	20.00%
<b>AGREE</b>	56.00%
<b>DISAGREE</b>	12.00%
<b>STRONGLY DISAGREE</b>	12.00%

Responses regarding the coordination of pre-employment transition services with school transition curricula were mixed, with 76% strongly agreeing or agreeing that services are coordinated. A fourth (24%) of the respondents either disagreed or strongly disagreed, indicating the opportunity for improving the coordination of VR transition services with that provided by the schools.

Cross tabulation for Q2 by staff role revealed that the role with the highest total "agree" responses were LEA direct providers (teacher, teacher aide, job coach employed by school).

STAFF ROLE	AGREE	DISAGREE	STRONGLY AGREE	STRONGLY DISAGREE	GRAND TOTAL
LEA DIRECT PROVIDER	5	1	1	2	9
LEA LEADERSHIP	3		1		4
OTHER (PLEASE SPECIFY)	3		2	1	6
TRANSITION COORDINATOR/SPECIALIST	3	2	1		6
<b>GRAND TOTAL</b>	<b>14</b>	<b>3</b>	<b>5</b>	<b>3</b>	<b>25</b>
<b>STRONGLY AGREE</b>	48.00%				
<b>AGREE</b>	32.00%				
<b>DISAGREE</b>	16.00%				
<b>STRONGLY DISAGREE</b>	4.00%				

Working relationships and communication were themes that emerged in both the quantitative data as well as the qualitative data. Overall, the majority of respondents indicated that the working relationship between LEA staff and VR staff is effective (80%). Cross tabulation of the responses for Q1 and Q3 indicated that of the respondents that selected "strongly agree" for Q1, ten of those also selected "strongly agree" for Q3.

Q1 RESPONSES	AGREE	DISAGREE	STRONGLY AGREE	STRONGLY DISAGREE	GRAND TOTAL
AGREE	3	1	2	1	7
DISAGREE	1	2			3
STRONGLY AGREE	4	1	10		15
<b>GRAND TOTAL</b>	<b>8</b>	<b>4</b>	<b>12</b>	<b>1</b>	<b>25</b>

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Cross tabulation of Q2 and Q3 revealed that of the respondents that selected "agree" for Q2, 12 selected either "agree" or "strongly agree" for Q3.

Q2 RESPONSES	AGREE	DISAGREE	STRONGLY AGREE	STRONGLY DISAGREE	GRAND TOTAL
AGREE	5	2	7		14
DISAGREE	3				3
STRONGLY AGREE			5		5
STRONGLY DISAGREE		2		1	3
GRAND TOTAL	8	4	12	1	25
AGE 15 OR YOUNGER	16.00%				
AGE 16 - 17	76.00%				
AGE 18	0.00%				
OVER AGE 18	8.00%				

Age of referral to VR was a component explored in the survey. Results indicated that the majority of partners typically refer students to VR at age 16 - 17 (76%). This is in keeping with VR practices that encourage referrals prior to the last year of high school. There were two respondents that indicated referrals are typically made when students are over 18, and four respondents that indicated that they typically refer students at age 15 or younger. Appropriate timing of referrals based on the individualized needs of the student is central to the ability of staff to provide effective and comprehensive transition services prior to the student's exit from high school. What is not visible in the survey results is the impact that the student's track may have on age of referral. For example, students on diploma track may benefit from referral for individualized VR services at age 16 if they are on course to graduate at age 18, but students on non-diploma track that may plan on utilizing additional years in secondary school may not anticipate graduation until age 21.

YES	76.00%
NO	24.00%
AT LEAST WEEKLY	12.50%
AT LEAST MONTHLY	54.17%
EVERY OTHER MONTH	8.33%
LESS THAN EVERY OTHER MONTH	4.17%
NOT APPLICABLE	20.83%

Questions related to frequency of meetings between LEA and VR staff showed a range of responses. Seventy-six percent of respondents (19) indicated that they did have regular meetings, and of those that had regular meetings, 54% indicated that they met at least once a month. There were five respondents that indicated "no" to question five,

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and went on to answer question 6 as "not applicable." Review of the themes that emerged from the qualitative survey data indicates that communication and availability of staff were major issues with regard to barriers to coordination on transition services and recommendations to strengthen school-to-work transition services.

<b>INSTRUCTION IN SELF-ADVOCACY</b>	2
<b>WORKPLACE READINESS TRAINING TO DEVELOP SOCIAL SKILLS AND INDEPENDENT LIVING SKILLS</b>	6
<b>COUNSELING ON OPPORTUNITIES FOR ENROLLMENT IN POST-SECONDARY EDUCATION</b>	0
<b>WORK BASED LEARNING EXPERIENCES</b>	16
<b>JOB EXPLORATION COUNSELING</b>	1

Respondents were asked which of the pre-employment transition services was most effective in preparing students. Most revealed that work-based learning is the most effective and relevant service related to employment outcomes according to respondents. This points to the need to develop capacity for providing work-based learning opportunities.

SERVICE	SERVICES AVAILABLE	SERVICES NOT AVAILABLE	DO NOT KNOW
<b>INSTRUCTION IN SELF-ADVOCACY</b>	22	2	1
<b>WORKPLACE READINESS TRAINING TO DEVELOP SOCIAL SKILLS AND INDEPENDENT LIVING SKILLS</b>	20	4	1
<b>COUNSELING ON OPPORTUNITIES FOR ENROLLMENT IN POST-SECONDARY EDUCATION</b>	20	1	4
<b>WORK BASED LEARNING EXPERIENCES</b>	21	4	0
<b>JOB EXPLORATION COUNSELING</b>	23	1	1

With regard to availability of services, the majority of responses indicated that the five pre-employment transition services were available.

<b>YES, WE HAVE A TRANSITION TIMELINE</b>	36.00%
<b>WE ARE CURRENTLY DEVELOPING A TRANSITION TIMELINE</b>	36.00%
<b>WE DO NOT CURRENTLY HAVE A TRANSITION TIMELINE</b>	28.00%
<b>YES</b>	48.00%
<b>NO</b>	52.00%

The intent of WIOA Pre-ETS is to ensure that all students with disabilities have access to preparatory activities while in high school. Questions related to the development of transition timelines indicate that most areas either have or are developing this, which can be an important tool in facilitating timely referrals to VR. The respondents that indicated that they do not have a transition timeline and are in need of information and resources to develop one can be targeted for assistance.

#### **Analysis of Qualitative Data**

The participants were asked to provide their opinions on three aspects in relation to transition services: barriers to collaboration on transition services, improvements to strengthen transition services, and any other recommendations to enhance VR services for students with disabilities. Each comment was reviewed and assigned to one or more themes.

- What are barriers to collaboration on transition services?
  - Coordination/communication (24%)
  - Time and availability of partners (20%)
  - Responses related to curriculum (13%)

A considerable proportion of participants identified coordination/communication (24%), time and availability of partners (20%), and curriculum-centered responses (13%) as barriers to collaboration. Coordination/communication included items such as working with multiple VR offices and staff, lack of communication between district-level staff and teachers, and not knowing what staff in different programs have discussed with students and parents about career goals and planning. Time and availability of partners included examples such as difficulties getting all agencies to meet on a regular basis, not having follow through from all parties, and getting past time constraints and multiple responsibilities. Curriculum centered responses included items such as need for increased opportunities for students to develop skills outside the school environment, differences in policies and procedures among agencies, and the need for hard skill training. Other barriers raised by a relatively small number of participants included administrative support, parental involvement, transportation, and funding/resources.

- Improvements to strengthen transition services
  - Coordination/communication
  - Curriculum
  - Access to services
  - Funding/resources
  - Parental involvement

Recommendations for improvement included the greatest proportion of responses related to coordination/communication (24%) and curriculum (18%). There were multiple thematic topics raised by a smaller number of respondents including the following: access to services, funding/resources, parental involvement, time/availability of partners, and transportation. When asked if there were any other recommendations, the top two themes were related to coordination/communication (33%) and curriculum (15%). Other responses included access to services, community involvement, and time/availability.

### Discussion

Respondents to the survey represented a wide variety of districts and roles across the state. Given the array of locations, it is feasible to generalize the results across multiple types of school districts. However, the sample size of 25 makes it difficult to generalize results to the different roles in LEAs.

Results of the survey indicate that there is good understanding of VR roles in the provision of school-to-work transition services and those services are widely available. Areas identified throughout the responses as having the potential for improvement include a focus on intentional communication and coordination with LEA partners, identifying time to be available for those activities that support active engagement and a collaborative, established curriculum that enhances work-based learning experiences and experiences that build skills outside of the school environment. These findings will be utilized to enhance the provision of well-coordinated and effective Pre-ETS.

The intent of WIOA Pre-ETS is to ensure that all students with disabilities are well prepared for further education/training or employment. Coordination among education and service provider entities has long been an expectation to support students with disabilities in achieving optimal postsecondary outcomes. Results of this study highlight areas that appear to be positively impacted by WIOA, as well as areas that remain opportunities for improvement. Updated data collection requirements under WIOA will allow for a more comprehensive view of services in the future to be provided to students, both VR clients and potentially eligible students that are receiving pre-employment transition services.

### Fiscal forecasting

A study by Honeycutt et. al (2015)<sup>3</sup> used data from the RSA-911 and other sources to identify a cohort of individuals that applied for VR services between 2004 and 2006. On average, 8% of youth with disabilities aged 16 to 24 applied for VR services, with this ranging from 4% to 14%. Fifty-six percent of transition-age youth who applied for services received them, with this parameter ranging from 31% to 82%. The potential impact from a state being on an order of selection was noted. In terms of employment, 56% were employed at time of case closure. South Carolina was on the higher end of the summary statistic (seventh highest).

Any reserved funds remaining, beyond the required amount necessary to reserve for the provision of Pre-ETS "required services" to all students with disabilities in need of such services, may be used for authorized activities. The following section outlines the methodology used to determine the targeted amount necessary for provision of required Pre-ETS, allowing SCVRD to utilize reserved funds for authorized activities. The data on the number of potential individuals eligible for Pre-ETS as well as targeted amounts of reserved funds necessary for ensuring the "required activities" under Pre-ETS are provided to students with disabilities are outlined.

- I. Determine the number of students with disabilities in the State that includes students eligible for the VR program as well as those "potentially eligible". Identify the source of this information.
  - - In South Carolina, the age range for providing transition services under IDEA is 13 to 21.

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- There are 27,306 students in public high schools in SC that are identified as students with disabilities (students that have an IEP).
    - Source: 2017 SC Dept. of Education Report Cards, retrieved from SC Dept. of Ed website, Data Files for Researchers, High School: Data Files for Researchers, High
    - Although school reports cards for 2018-2019 are available, the format and content has been changed and no longer includes enrollment of students with an IEP.
  - To date, VR has been unable to obtain State totals on students with 504 plans. VR provided the State Department of Education with a formal request for the information, which was declined. Efforts to obtain this data will continue.
  - In 2017, there were an estimated 19,600 individuals aged 16 to 20 that reported having a disability.
    - Source: American Community Survey, 2017, retrieved from Cornell University Disability Statistics website [www.disabilitystatistics.org](http://www.disabilitystatistics.org)
- II. Determine the number of students with disabilities in the State that need Pre-ETS required and coordination activities, including those currently receiving such services.
1.
    - a. To identify the need for Pre-ETS, data demonstrating the prevalence of disability among non-institutionalized people age 16 to 20 was gathered. In 2013, this total was 20,800. In 2015, this total was 23,105. In 2017, this total was 19,600. Data on the types of disability experienced by students served under IDEA was evaluated. This demonstrated that specific learning disability, speech or language impairment, and intellectual disability were the top three types of disabilities for students served under IDEA. In addition, data on the prevalence of autism for students and youth with disabilities (age 16 to 25) reflected this to represent an emerging disability. The CSNA also identified youth with most significant disabilities, including those with intellectual disability and multiple disabilities, as an emerging population requiring VR services. Prevalence data was considered along with school district information on the number of students enrolled in high school that were receiving special education services (27,306) in estimating the number of students in the state that were eligible or potentially eligible for VR services. Based on all available data, the school district total (27,306) was determined to be the most accurate figure to be used in estimates.
    - b. Based upon verifiable VR agency data over a three-year period (SFY 2017 - SFY 2019), on average, 73.30% of the students with disabilities that were offered required Pre-ETS activities did not accept such services. The number of students used to calculate the cost in step III for provision of Pre-ETS is therefore reduced by that percentage, reflecting 7,291 students that are projected to accept and receive services.

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- i. SFY 2016: 21,931 students who were offered Pre-ETS opted not to receive services (80.31% of total students); 5,375 accepted and received Pre-ETS.
- ii. SFY 2017: 21,537 students who were offered Pre-ETS opted not to receive services (78.87% of total students); 5,769 accepted and received Pre-ETS.
- iii. SFY 2018: 21,766 students who were offered Pre-ETS opted not to receive services (79.71% of total students); 5,540 accepted and received Pre-ETS.
- iv. SFY 2019: 16,746 students who were offered Pre-ETS opted not to receive services (61.33% of total students); 10,560 accepted and received Pre-ETS
- c. A four-year average of students who were offered Pre-ETS activities but who did not accept such services was also evaluated; however, it was felt that the most recent three year term provided a more accurate reflection of the current status of Pre-ETS and the growth in students accepting and receiving Pre-ETS activities.
- d. Demonstrate that the required services have been made available to all that need them.
  - i. Pre-ETS are delivered primarily through dedicated school-to-work transition counselors and pre-employment transition specialists. There are transition counselors assigned to every public high school in the State, including at the State Department of Juvenile Justice facility. Counselors work collaboratively with local educational agency (LEA) staff to identify students with disabilities. They are located on-site in the high schools and establish a schedule through which individualized and group Pre-ETS are provided to students with disabilities. These services are made available to all students with disabilities, including potentially eligible students. VR transition counselors enlist the assistance of teachers, guidance counselors, school nurses, school transition coordinators/specialists, school job coaches, school-based mental health counselors, career specialists and administrators to ensure that students with many different types of disabilities are made aware of the availability of Pre-ETS. This includes students with IEPs, students with 504 plans, and students with disabilities who do not have an IEP or 504 plan but would meet the requirements to have a 504 plan. Students with most significant disabilities who require supported employment services and more intensive supports are identified and referred to the VR youth job coach. Workplace readiness training and work-based learning experiences are provided both in the schools and in the community, as well as through SCVRD's work training centers located throughout the State. In many locations, schools transport students to the work training centers during the school day. These work-based learning services provide a foundation from which students can

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- move on to community based work experiences, internships, and other job exploration and work readiness training activities.
- ii. Transition counselors present information on Pre-ETS at teacher trainings and administrative meetings, school assemblies, parent night events, and resource fairs. In addition, The Transition Alliance of South Carolina (TASC) is an interagency collaborative whose mission is to increase successful student post-secondary transition outcomes through active interagency collaboration. Their efforts help build capacity for transition programming at the State level, while also serving as a bridge to local communities. Through their support, 61 local interagency transition teams have been established. These teams are another avenue for making stakeholders aware of the availability of Pre-ETS.
  - iii. Information on Pre-ETS and transition services for students with disabilities is located on the SCVRD website ([scvrd.net](http://scvrd.net)).
  - iv. SCVRD does not currently utilize any Third Party Cooperative Agreements (TPCA) for provision of Pre-ETS.
2. Calculate the cost for the provision of Pre-ETS required and pre-employment transition coordination activities.
    - a. In SFY 2016, SCVRD estimates it provided services to 5,375 students with disabilities at an average cost per student of \$1,338.
      - i. Costs for Pre-ETS on SF-425 reports during SFY 2016 were \$7,195,457.
    - b. In SFY 2017, SCVRD estimates it provided services to 5,769 students with disabilities at an average cost per student of \$1,245.
      - i. Costs for Pre-ETS on SF-425 reports during SFY 2017 were \$7,187,450.
    - c. In SFY 2018, SCVRD provided Pre-ETS to 5,540 students.
      - i. Costs for Pre-ETS on SF425 reports during SFY 2018 were \$7,669,190.
      - ii. Average cost per student \$1,384
    - d. In SFY 2019, SCVRD provided Pre-ETS to 10,560 students
      - i. Costs for Pre-ETS on SFY425 reports during SFY 2019 were \$7,316,973.
      - ii. Average cost per student \$693
    - e. For SFY 2016 - 2019, the average cost per student for Pre-ETS was \$1078 per year. This is based on the aggregate total of Pre-ETS costs divided by the aggregate total of students served (\$29,369,070 divided by 27,244).

III.

IV. Calculate the amount of funds reserved for the provision of Pre-ETS that must be set aside for the provision of Pre-ETS required and pre-employment transition coordination activities.

- - Multiplying the number of eligible or potentially eligible students projected to accept and receive Pre-ETS by the projected cost per student (7,291 at \$1078 per student), which takes into account students who will access and receive Pre-ETS through comparable benefit, and those students with disabilities who will opt not to access or receive Pre-ETS, it is anticipated that we will require \$7,859,698 for providing required and pre-employment transition coordination activities under Pre-ETS.
  - The cost of pre-employment transition coordination activities was tracked separately beginning in SFY 2018 and is included in the average cost per student served.
- Calculate whether the agency's VR funds required to be reserved for the provision of Pre-ETS are sufficient to make Pre-ETS required and pre-employment transition coordination activities available to all students with disabilities needing such services.
  - For FFY 2017, 15 percent of the total Federal allotment for the Pre-ETS set aside amount was \$8,395,536. Based on fiscal forecasting, \$7,151,760 was projected for required and pre-employment transition coordination activities, leaving \$1,243,776 available for authorized activities.
  - For FFY 2018, 15 percent of the total Federal allotment is \$8,995,567. Based on fiscal forecasting, \$7,348,723 is required to be set aside for Pre-ETS required and pre-employment transition coordination activities. The remainder (\$1,646,844) is what SCVRD has to spend on authorized activities (FFY 2018 allotment).

For FFY 2019, 15 percent of the total Federal allotment is \$8,731,232. Based on fiscal forecasting, \$7,859,698 is required to be set aside for Pre-ETS required and coordination activities, leaving \$871,534 available for authorized activities.

<sup>1</sup> 2017 SC Department of Education Report Cards retrieved from SC Dept. of Ed website, Data Files for Researchers, High School: Data Files for Researchers, High).SCDE Data Files for Researchers

<sup>2</sup> 38<sup>th</sup> Annual Report to Congress on the Implementation of the Individuals with Disabilities Act, 2016. 2016 Annual Report to Congress on the Implementation of IDEA

<sup>3</sup> Honeycutt, T., Thompkins, A., Bardos, M., & Stern, S. (2015). State differences in the vocational rehabilitation experiences of transition-age youth with disabilities. Journal of Vocational Rehabilitation, 42(1), 17 – 30.

## 2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

Based on the findings in the most recent CSNA noted in section j.1.A., B., C., D., and E, the network of SCVRD area offices, work training centers and comprehensive programs across the state ensure statewide delivery of VR services to all populations in need of VR services.

SCVRD is unique among public VR programs in that it owns and operates its own Community Rehabilitation Programs (CRPs). The bulk of direct consumer services are delivered by SCVRD staff through its network of area offices, staff located at itinerant sites, and job readiness training centers (work training centers). Because of the service delivery structure established by SCVRD, there are needs related to the ongoing operation of its CRPs (area offices, work training centers, and comprehensive programs).

In response to the WIOA mandates for provision of Pre-Employment Transition Services (Pre-ETS), SCVRD is expanding its approach to service delivery for students through contractual and pilot programs to ensure that all statutory and regulatory requirements are met, and that Pre-ETS are made available to all eligible and potentially eligible students that are interested in receiving those services.

### Area Office Capital Projects - SFY 2020 - 2024

The state of South Carolina requires that agencies submit for approval a five-year Comprehensive Permanent Improvement Plan (CPIP). This forms the basis for identifying needs for routine maintenance such as roofs and building repair. It also includes projects that are necessary to extend the life or expand use of existing structures, which were included in our most recent CSNA to establish the need for those projects.

#### Parking Lot Repair

The following SCVRD area office locations have repaving projects identified in the CPIP for SFY 2020 - 2024:

**Anderson:** Repair and resurface the existing parking lot and loading area. Subsurface investigations will be required to determine the level of deterioration of the existing paved areas. Exterior lighting will also be added to the parking areas for increased safety and security. The existing paved areas have deteriorated and are in need of repair and resurfacing, since the facility is over 31 years old.

**Marlboro:** Repair and resurface the existing parking lot and loading area. This facility is over 26 years old, and the parking lot and loading areas are in need of repair and resurfacing. Subsurface investigations will be required to determine the depth and extent of deterioration of the existing paving prior to resurfacing. Exterior lighting will also be added to the parking areas for increased safety and security.

**Conway:** Repair and resurface the existing parking lot and loading area. This facility is over 40 years old, and the parking lot and loading areas are in need of repair and resurfacing. Subsurface investigations will be required to determine the depth and extent of deterioration of the existing paving prior to resurfacing. Exterior lighting will also be added to the parking areas for increased safety and security.

**Lexington:** Repair and resurface the existing parking lot and loading area. This facility is over 37 years old, and the parking lot and loading areas are in need of repair and resurfacing. Subsurface investigations will be required to determine the depth and extent of deterioration of the existing paving prior to resurfacing. Exterior lighting will also be added to the parking areas for increased safety and security.

#### Other CPIP Projects – SFY 2020 - 2024

At its offices and work training centers throughout the state, SCVRD has 77 HVAC systems that are more than 15 years old. All of these units use HCFC-22 or R142b refrigerants, which will no longer be produced or imported after 2020, and will be available only through stockpiled quantities. SCVRD will work with the State Energy Office in assessing all aging HVAC units and developing plans for replacement or repair. Replacement will also assist the agency in achieving the State Energy Office's required 20% reduction in energy usage by 2020.

There is a need to replace an existing cooling tower due to wear on existing equipment in the SCVRD state office located in West Columbia.

#### Oconee Pickens – Seneca office expansion

Some years ago, the need to expand the SCVRD area office and work training center located in Seneca (referred to internally as the Oconee Pickens office) was identified. As stated earlier in the CSNA, Oconee and Pickens counties are largely rural counties that are situated within the Upstate region of the state. That region has experienced extensive growth in many industries such as advanced manufacturing and health care. In combination with interest from employers and legislators, the Oconee Pickens office has been identified as a site needing additional capacity (space) for service delivery staff. In response to WIOA as well as local and regional economic and workforce development needs, it has also been identified as a location requiring expansion of its work training center facility to provide customized and demand-driven training opportunities for consumers. With expansion of the work training center, there will be development of customized and demand-driven trainings that meet the needs of business and industry that have previously been limited due to space. Support for state funding for the project demonstrates the need and interest of the community.

With the expansion of the work training center, acquisition of additional business contracts in advanced manufacturing techniques are subassembly are anticipated. Examples of current contracts include Electrolux - fan assembly; Greenfield Industries - drill bit quality control, sorting, and packaging; Ulbrich - medical spool quality control and sorting; Parkway Products - door fuel inlet automotive assembly; and Schneider Electric - Trip Switches sub assembly.

The purpose of these contracts is to provide job readiness training and skills enhancements for SCVRD consumers that, in turn, meets the needs of employers in the community. It will also allow us a greater ability to work with our business partners on the development of demand driven and customized trainings. One of the strategies included in the SC WIOA state plan is sector partnerships, which are industry-led coalitions focused on a specific employment sector. In the Greater Upstate region, the manufacturing sector partnership has identified an action team to address gaps in middle-skill technical jobs. Capacity for demand-driven and customized trainings that are informed by this industry group will be available through these additional contracts with business. Eligible SCVRD consumers who have been identified on their IPE as needing job readiness training and vocational training in manufacturing will be training on these contracts (job readiness training).

The additional contracts are anticipated to generate approximately \$8640 per month in program income. In accordance with CFR 361.63, program income earned will be used to supplement Federal funds that support SCVRD's program activities.

Per the project plan submitted to the State, the following is a summary of the project:

Design and construct an 8200 square foot addition and 1407 square foot renovation to the existing Work Training Center and production space, clean work room, offices, and storage. This addition will be utilized for additional contract work space used to provide consumers with job readiness training.

Replace the roof of the Oconee/Pickens VR Center Building, consisting of approximately 20,000 square feet of roof deck. Remove approximately 20,000 square feet of existing built up roof. Apply roof insulation and SBS smooth granular surfaced modified bitumen roofing system with associated flashings and metalwork. New roofing system to have a 20-year warranty. Removal and disposal of asbestos containing roofing and flashing materials may be required.

The roof is approximately 29 years old and has exceeded its life expectancy. The addition is needed to increase capacity to serve the growing consumer population in this region, as well as to increase the types of contract work necessary to train our consumers for competitive employment.

SCVRD has historically operated two substance abuse treatment facilities in the state, Holmesview Center in Greenville and Palmetto Center in Florence. Holmesview Center was destroyed in a fire in November of 2016. Plans for rebuilding that Center are currently going through state procedures. Due to aging infrastructure and safety concerns, the Palmetto Center was rebuilt, and the new facility is in the final stages of state approval. The need for these existing programs has long been established.

**3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act**

Section (E) of the Statewide Needs Assessment outlines current data on prevalence of disability for youth and students with disabilities in South Carolina. It also describes recent totals of students served under IDEA Part B, the types of disabilities experienced and current totals of students in high school with an IEP.

Additionally, information in section (E) of the Statewide Needs Assessment identifies the gap in graduation rates for students with disabilities, highlighting the need for effective transition career services and Pre-Employment Transition Services.

To meet the needs of students and youth with disabilities, SCVRD coordinates with school districts, partner organizations and service providers to complement and support a wide range of school-to-work transition services, including Pre-Employment Transition Services.

During SFY 2015, SCVRD received 4,451 transition-aged referrals (age 14 to 24 at application). During the year, 8,988 transition-aged youth were active consumers with many of them still in high school or college. 1,966 transition-aged youth had successful employment outcomes during SFY 2015, which continues the upward trend that has occurred since SFY 2013 (48 percent increase).

As Pre-Employment Transition Services to students with disabilities expanded, SCVRD increased the number of students and youth referred and receiving services. In SFY 2017, 4,854 transition-aged youth were referred for services. This included 2,493 students with disabilities who were referred by the school system. A total of 8,523 students who were referred by the school system were active in the VR system during the year. Employment outcomes remained stable, with 1,888 successful employment outcomes for transition-aged youth, 1,052 of whom were referred by the school system.

Based on the past three years' data on services for students and youth, SCVRD estimates it will provide services, including but not limited to Pre-Employment Transition Services, to approximately 8,480 individuals who are initially referred by the school system.

Data collection for the new 911 Case Services Report will allow for better identification of students with disabilities and provision of Pre-Employment Transition Services. As the new data becomes available,

projections and fiscal forecasting for the provision of Pre-Employment Transition Services will be updated.

Pre-ETS are delivered primarily through dedicated school-to-work transition counselors, school partners and three independent living centers. There are transition counselors assigned to every public high school in the state, including at the state Department of Juvenile Justice facility. Counselors work collaboratively with local education agency staff to identify students with disabilities. They are located on-site in the high schools and establish a schedule through which individualized, and group Pre-Employment Transition Services are provided. These services are made available to all students, including potentially eligible students. VR transition counselors enlist the assistance of teachers, guidance counselors, school nurses, school transition coordinators/specialists and school job coaches to ensure that students with many different types of disabilities are made aware of the available pre-ETS services. This includes students with IEPs, students with 504 plans, and students with disabilities who may not have either but would meet the requirements to have a 504 plan. Students with most significant disabilities who require supported employment services and more intensive supports are identified and referred to the transition coach for provision of Pre-Employment Transition Services. Workplace readiness training and work-based learning experiences are provided both in the schools and in the community, as well as through SCVRD's job readiness training centers located throughout the state. In many locations, schools transport students to the job readiness training centers during the school day. This training provides a foundation from which students can move on to community-based work experiences, internships, and other job exploration and work readiness training activities.

Transition counselors present information on pre-ETS at teacher trainings and administrative meetings, school assemblies, parent night events, and resource fairs. In addition, The Transition Alliance of South Carolina (TASC) is an interagency collaborative whose mission is to increase successful student postsecondary transition outcomes through active interagency collaboration. Their efforts help build capacity for transition programming at the state level, while also serving as a bridge to local communities. Through their support, 59 local interagency transition teams have been established. These teams are another avenue for making stakeholders aware of the availability of pre-ETS.

Information on pre-ETS and transition services for youth is located on the SCVRD website.

TASC is a robust state-level interagency collaborative that works in support of increasing positive postsecondary outcomes for students with disabilities. It has multiple stakeholder agencies and organizations, and supports local level interagency teams through training, technical assistance, and strategic planning.

The department continues to coordinate the development of designated staff with emerging initiatives by the SCDE and the 81 local school districts (LEAs) under IDEA and state school-to-work transition efforts. Transition training efforts this year included the following: a two-day transition summer series was conducted for transition staff that included interactive activities and presentations on effective delivery of Pre-Employment Transition Services. Over 40 transition staff participated in an annual interagency transition conference, focused on local interagency planning and content sessions focused on effective service delivery for students with disabilities. Youth leaders also participated in the conference. Disability-specific modules on learning disabilities, intellectual disabilities and autism spectrum disorders are available for all staff via LOTIS, the agency's online training site. In addition to the disability-specific training modules, a module on transition basics, with a focus on evidence-based practices and quality service delivery, has been developed and is delivered in person to all SCVRD transition personnel. This has become the standard training for all new staff working with transition students.

The TSS collaborative approach to the provision of transition services was continued this year and was expanded to 20 schools. This approach designates a transition services specialist – who is a school

district employee – to provide Pre-ETS and to act as a liaison to refer students to the department and assist these students in participating in transition activities and work-based experiences in the community. This outreach effort has improved access to VR services for students with disabilities in the areas in which the program is operating and has increased our collaborative efforts with the local school district.

The department continues to designate a liaison counselor who provides Pre-Employment Transition Services to each public secondary school throughout the state. During this past year state office and local staff have provided in-service training to school staff, parents, and students regarding service availability. Also, cooperative agreements with DJJ and the Will Lou Gray Opportunity School afford the ability to work collaboratively to serve at-risk youth prior to their exit from high school.

### ***k. Annual Estimates***

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Describe:

#### **1. The number of individuals in the State who are eligible for services**

According to the United States Census data, the estimated population in South Carolina on July 1, 2019 is 5,148,714. The proportion for 2014 to 2018 under the age of 65 that identifies as having a disability is 10.4%. Therefore, there are an estimated 535,466 South Carolinians who have a disability and may, potentially, be eligible for our services.

#### **2. The number of eligible individuals who will receive services under:**

##### **A. The VR Program;**

Based on historical performance data from prior federal fiscal years, the estimated number of eligible individuals who will receive services under the VR program is:

FFY20 – 32,000

FFY21 – 32,000

##### **B. The Supported Employment Program; and**

Title VI, Part B – FFY 2020: 249      FFY 2021: 249

##### **C. Each priority category, if under an order of selection.**

SCVRD is not under an order of selection.

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

SCVRD is not under an order of selection.

#### **4. The cost of services for the number of individuals estimated to be eligible for services.**

If under an order of selection, identify the cost of services for each priority category.

FFY 2020: \$89,748,618    FFY 2021: \$89,089,618

### ***I. State Goals and Priorities***

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The designated State unit must:

#### **1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions**

SCVRD is an independent commission.

## 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs

The SCVRD Strategic Planning Template below outlines the goals, strategies and measures developed for the agency. These goals were established based on the findings of the most recent comprehensive statewide needs assessment, as well as the state's performance under the performance accountability measures of section 116 of WIOA and other agency performance data and reports. These goals, strategies and measures are updated annually in conjunction with the agency's strategic planning efforts as well as state-specific reporting requirements. Each goal is tied to a defined strategy and set of measures, designed to be specific, measurable, attainable, relevant/realistic, and timely. These are long-term planning goals, strategies, and measures that include, at minimum, annual assessment of results as well as adjustment and revision based on the needs of the state and further implementation of WIOA.

### Strategic Planning Template

TYPE	GOAL	STRATEGY	MEASURE	ASSOCIATED ENTERPRISE OBJECTIVE	DESCRIPTION
G	1			Education, Training, and Human Development	Successful employment outcomes for South Carolinians with disabilities through specialized, individualized services
S		1.1			Improve the quality of employment outcomes for eligible individuals with disabilities.
M			1.1.1		Percentage of program participants who are employed during 2nd quarter after exit
M			1.1.2		Percentage of program participants who are employed during 4th quarter after exit
M			1.1.3		Percentage of program participants obtaining recognized post-secondary credential or a secondary school diploma during participation or within one year of exit
S		1.2			Enhance school-to-work transition services.
M			1.2.1		Number of students receiving Pre-Employment Transition Services as specified by WIOA
M			1.2.2		Percentage of individuals served by agency who are in transition age range (14-24)
M			1.2.3		Student participation in Disability Mentoring Day activities
S		1.3			Enhance job-driven vocational training programs.
M			1.3.1		Percentage of participants who are in education or training program achieving measurable skills gains

VI. PROGRAM-

TYPE	GOAL	STRATEGY	MEASURE	ASSOCIATED ENTERPRISE OBJECTIVE	DESCRIPTION
M			1.3.2		Consumers participating in customized training and demand-driven training
G	2			Government and Citizens	We will be a team of highly qualified professionals who have the commitment, accountability, and opportunity to excel.
S		2.1			Provide training to equip staff to enhance their ability to provide quality vocational rehabilitation services.
M			2.1.1		New employees who completed all assigned training in their first year of employment.
M			2.1.2		Percentage of Professional Development class attendees who evaluate the course as "useful" or "very useful" for their development and job performance.
S		2.2			Foster an environment promoting professional growth and future leadership opportunities, employee accountability and ethical standards.
M			2.2.1		Level of Goal Attainment Toward Equal Employment Opportunity
M			2.2.2		Agency staff turnover rates compare favorably with average for S.C. state government and average for government entities nationally
M			2.2.3		Percentage of consumer complaints resolved without need for formal administrative review
G	3			Government and Citizens	Accountability to taxpayers through efficient and effective use of resources entrusted to us
S		3.1			Successful outcomes for clients and claimants using resources efficiently
M			3.1.1		Median earnings of program participants who are employed during 2nd quarter after exit
M			3.1.2		Amount each successfully rehabilitated consumer will repay in taxes for each dollar spent on his or her rehabilitation
M			3.1.3		Percentage of consumers surveyed one year after successful employment outcome who say they would recommend VR to others
M			3.1.4		SSA Disability Determination Documentation Accuracy

**VI. PROGRAM-**

<b>TYPE</b>	<b>GOAL</b>	<b>STRATEGY</b>	<b>MEASURE</b>	<b>ASSOCIATED ENTERPRISE OBJECTIVE</b>	<b>DESCRIPTION</b>
S		3.2			Continued evaluation and improvement of key processes
M			3.2.1		Agreed Upon Procedures audit findings
M			3.2.2		Program Integrity Compliance Assurance results
M			3.2.3		Average number of days for consumer advancement from application to development of Individualized Plan for Employment
S		3.3			Ensure safety, security and adequacy of infrastructure.
M			3.3.1		Lower the Experience Modifier (EMOD) through excellence in safety precautions
M			3.3.2		SOC alert incidents are addressed and reported within 24 hours
M			3.3.3		Annual completion of cyber security awareness training by all VR general program employees
G	4		Public Infrastructure and Economic Development		Maintain a dynamic network of partnerships to shape a better future for all stakeholders.
S		4.1			Increase collaboration with other state agencies and community organizations.
M			4.1.1		New applicants referred for VR services
M			4.1.2		Increase in cooperative agreements associated with strategic goals
M			4.1.3		VR involvement level with integrated business service teams for all local Workforce Development Boards
S		4.2			Mutually beneficial partnerships with business and industry that provide employment/ training opportunities for consumers and a talented, skilled workforce for the business community.
M			4.2.1		Employer penetration rate
M			4.2.2		Repeat business customer rate
M			4.2.3		Agreements with business and industry for job readiness training for VR consumers

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

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

The goals, strategies and measures in the SCVRD Strategic Plan were established based on the findings of the most recent comprehensive statewide needs assessment, as well as the state's performance under the performance accountability measures of section 116 of WIOA and other agency performance data and reports.

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

During the baseline phase for the new WIOA common performance measures (CPMs), SCVRD has developed reports for monitoring performance on these new key indicators and has reviewed the data and shared progress, including RSA data dashboards, with all levels of management at designated intervals. These priorities (CPMs) have been formalized through goals and objectives in the Agency's Strategic Planning Template (e.g., 1.1.1; 1.1.2; 1.1.3; 1.3.1; 3.1.1; 4.2.1; and 4.2.2).

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

While the WIOA CPMs have remained in baseline status for VR programs, SCVRD has continued to utilize its Program Integrity (PI) model for evaluating program effectiveness and identifying priorities for strategic planning. The PI model includes measures of compliance with quality standards, customer satisfaction, and productivity in terms of successful employment outcomes. For PY19, measures were added for Measurable Skill Gains, Recognized Credential Attainment, and Median Earnings.

***m. Order of Selection***

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Describe:

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

**A. The order to be followed in selecting eligible individuals to be provided VR services**  
SCVRD is not implementing an order of selection.

**B. The justification for the order**

SCVRD is not implementing an order of selection.

**C. The service and outcome goals**

SCVRD is not implementing an order of selection.

**D. Time within which these goals may be achieved for individuals in each priority category within the order; and**

SCVRD is not implementing an order of selection.

**E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities**

SCVRD is not implementing an order of selection.

**2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment**

SCVRD is not implementing an order of selection.

*n. Goals and Plans for Distribution of title VI Funds***1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services**

SCVRD's supported employment goals and plans regarding the Title VI program are based on an analysis of the comprehensive statewide needs assessment and the department's performance on the common performance measures as well as agency key performance indicators. The priorities are as follows:

- Strengthening service delivery afforded to individuals whose disabilities and vocational needs are so significant that SCVRD's 110 traditional program services would not be sufficient to meet their employment needs;
- Providing services to people with the most significant disabilities, especially SSI and/or SSDI recipients, in order to successfully achieve and maintain competitive employment in integrated work settings; and
- Providing supported employment services to youth with the most significant disabilities.

In SFY 2019, SCVRD used designated funds received under section 603 of the Rehabilitation Act for the provision of supported employment services for the following goals and priorities:

- Job coaches serving the Conway, Sumter, Spartanburg, and Lexington areas.
- SCVRD continues its partnership with DDSN in an ongoing demonstration project designed as an intensive placement and support program in the Lexington area. DDSN makes referrals to a specified VR counselor and job coach who are designated to exclusively serve these consumers. This demonstration project incorporates many of the IPS evidence-based practices in providing services to individuals with most significant disabilities including those with intellectual disabilities. The key practices focus on individualized, consumer-centered services to assist persons with cognitive impairments and emphasize rapid job placement as appropriate into competitive, integrated jobs. Follow up supports are provided in integrated work settings. In SFY 2019, the Lexington site achieved a 100 percent rehabilitation rate.

**2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:****A. The provision of extended services for a period not to exceed 4 years; and**

Activities with funds reserved for services for youth with the most significant disabilities (section 603(d)) included the following:

Project SEARCH is a national model based on intensive internship experience and job coaching. It pairs students in their final year of school with a host business/employer site that includes a series of internships to build job skills as well as to explore career opportunities. This program model is business-led, with partner support provided through the school district, VR, Development Disabilities agencies, and other community partners. It focuses on serving young adults with intellectual and developmental disabilities, as well as other students who may not otherwise have access to the immersion-based approach of this program. Interns in Project SEARCH train in real work settings, which allow the program staff to teach competitive, marketable, and transferable skills. The outcome goal of the program is competitive, integrated employment. The first site in South Carolina was established in Spartanburg during SFY 2014. This has now expanded to fourteen sites. In this program, students participate in a series of internships at a host business site, receive intensive instruction and job coaching, and are placed into competitive employment, often at the host business site and often prior to completion of their final year of high school. The ten sites that have been operating for longer than one year

have an average success rate of 77% (participants achieving competitive, integrated employment).

Transition to extended services starts after an individual is stabilized in his/her job setting and has met the individualized work goal. The consumer's employment stability is determined by the achievement of adequate job performance without a need for ongoing, intensive shadowing/mentoring from the job coach. The consumer, employer, job coach, and SCVRD counselor agree that this has occurred before transition to the extended service provider takes place. SCVRD continues to leverage resources for identifying extended service providers to meet long-term support needs. Extended services providers are identified in each area. Partnerships at the state and local level with DDSN and its network of providers continue to grow and provide key linkages to extended services providers, utilizing available non-VR funds. Planning for extended services is done in advance, such that service provision can be authorized timely and allow for a seamless transition from VR services to the extended services provider's follow along.

Typically, and as determined by the consumer's supported employment needs, there is an intensive job coaching period of two to six weeks beginning at the time of job attainment. This is followed by ongoing, though less intensive, job coach involvement of at least 90 or more days prior to determining whether the consumer is ready for extended services.. In addition, SCVRD may provide post-employment services following transition if needed to maintain the placement.

**B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.**

SCVRD leverages other public and private funds to increase resources for extended services. Extended services providers are identified in each area to provide follow along and extended services following successful exit from the VR program. Partnerships at the state and local level with DDSN and the local DSN boards and other DDSN-contracted providers continue to grow and provide key linkages to extended services providers.

SCVRD is one of 14 partners working together on a Partnerships in Employment (PIE) grant awarded to SC Disability Employment Coalition. SC has six pilot sites with a focus to increase employment outcomes for youth with intellectual and other developmental disabilities. This is done in line with SC's Employment First Initiative.

### ***o. State's Strategies***

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Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

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

SCVRD is entering into TSS agreements with additional schools to enhance the transition services, including Pre-ETS, provided in those schools. More job coaches are also being hired to increase the capacity to provide the level of support they offer. The IPS program, in partnership with DMH, has been expanded to every mental health center in the state, to include 17 sites. And, SCVRD is now involved with fourteen Project SEARCH sites in the state.

**2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis**

Rehabilitation engineers provide evaluation and implementation of assistive technology devices throughout the rehabilitation process based on individualized consumer needs.

**3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program**

SCVRD has hired regional staff who are fluent in Spanish and who are fluent in sign language to increase capacity for reaching and serving the Hispanic and Deaf and Hard of Hearing populations, respectively. Both of these populations have and/or are anticipated to increase in the state, per the Comprehensive Statewide Needs Assessment.

**4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services)**

In response to the WIOA mandates for provision of Pre-Employment Transition Services (Pre-ETS), SCVRD is expanding its approach to service delivery for students through contractual and pilot programs to ensure that all statutory and regulatory requirements are met, and that Pre-ETS are made available to all eligible and potentially eligible students that are interested in receiving those services. Contracts have been established with the state's Centers for Independent Living (CILs) for the provision of Pre-ETS to supplement the Pre-ETS that are delivered by SCVRD staff.

The State Board of Education statute, 43-243, requires the mandatory participation of representatives of state agencies involved in the financing or delivery of related services to children with disabilities in the state's Advisory Council for Educating Students with Disabilities. The Advisory Council's purpose is to provide recommendations and input on special education and related services for students with disabilities to the Office of Special Education Services.

SCVRD and the SCDE are signatories and partners in a Memorandum of Agreement (MOA), executed on July 7, 2017. This agreement expresses a basic commitment on behalf of both agencies to provide comprehensive vocational and educational services to individuals with disabilities. The agreement details each entity's roles and responsibilities, including financial responsibilities, in identifying and serving students with disabilities. Items covered in the agreement include: student identification and exchange of information, procedures for outreach to students with disabilities who need transition services, methods for dispute resolution, consultation and technical assistance to assist educational agencies in planning for school-to-work transition activities, and the requirements for regular monitoring of the agreement. Timing of student referrals is individualized based on need but should generally occur no later than the second semester of the year prior to the student's exit from school.

Using the SCVRD-SCDE MOA as a model, SCVRD has developed agreements with all local education agencies in the state. These MOAs clarify roles and responsibilities at the local level. There is an SCVRD counselor assigned to each of the high schools in the state, whose purpose is to provide Pre-Employment Transition Services, be a resource for coordination activities to ensure provision of Pre-Employment Transition Services, participate in school-based meetings as appropriate, and to seek referrals of students who can benefit from SCVRD services. SCVRD also maintains an agreement with the South Carolina School for the Deaf and the Blind.

SCVRD is an active partner in the Transition Alliance of SC (TASC). TASC hosts yearly conferences in which this information is shared via presentations. VR Counselors provide information sessions to school

partners throughout the school year. SC's Department of Disabilities and Special Needs (SCDDSN) has three Transition Specialists who collaborate with SCVRD's Transition Coordinator and share information collaboratively at Transition Fairs, conferences and other school related activities. SCVRD's Transition Coordinator works directly with staff at the SC Department of Education, in particular, the Director of the Office of Special Education Services to share information at meetings.

SCVRD maintains a priority on providing work-based learning experiences for students. In keeping with evidence-based practices that support work experience to be one of the most influential factors in successful postsecondary employment outcomes, transition staff actively pursue a variety of paid and unpaid work based learning opportunities, to include job tryout, job shadowing, internship, and apprenticeship opportunities for students. This impacts not only the ultimate outcome of competitive, integrated employment but has been shown to be an integral support for school completion and drop-out prevention.

In collaboration with the SC Department of Employment and Workforce (SCDEW) and the SCDE, SCVRD's school-based transition counselors work together with local education agencies, community partners, workforce development boards, SC Works Centers and business partners to advise students with disabilities, and their families, regarding available career pathways and educational/training opportunities.

SCVRD maintains a Transition Services Coordinator position and additional Transition Specialist positions whose duties focus on the authorized activities required for effective provision of Pre-Employment Transition Services. These include:

- Coordinate all transition-related activities and projects, including those that involve other agencies, community organizations and local SCVRD field offices;
- Develop, monitor and update all transition documents and cooperative agreements;
- Provide technical assistance, professional development and training on transition-related issues to field office staff, education personnel, community organizations, families, and students;
- Review and update consumer service policy to ensure policies and procedures are reflective of SCVRD mission and focus on quality in serving youth in transition;
- Participate in TASC, an interagency initiative to create systems change and support development of local interagency transition teams.

SCVRD continues to facilitate the development of innovative transition services to improve the successful outcomes of students and transition-aged youth. In this effort, SCVRD has integrated evidence-based practices for successful transition into the service delivery system. SCVRD also offers several additional programs to enhance transition services:

- Transition Services Specialist (TSS) – a cooperative funding initiative that enhances the general transition services offered to a school by engaging a school employee designated as the Transition Services Specialist. The TSS coordinates with the assigned SCVRD counselor, to provide Pre-Employment Transition Services. Work-based learning experiences are a critical component of the initiative. The intent of this program is to support higher rates of successful secondary school completion, enrollment in postsecondary training, and subsequent entry and maintenance of competitive, integrated employment. There are currently 21 such agreements in place. There is no third party match with our agreements.
- Project SEARCH – this nationally recognized program is a one-year high school transition internship program providing training and education leading to employment for individuals

with intellectual and developmental disabilities. SCVRD has seen Project SEARCH programs expand in South Carolina to fourteen sites. There is no third party match with our agreements.

- Postsecondary Programs for Individuals with Intellectual Disabilities – SCVRD collaborates with the five postsecondary programs in South Carolina for young adults with intellectual disabilities:
  - Carolina LIFE,
  - Clemson LIFE,
  - Coastal Carolina LIFE,
  - [College of Charleston] REACH, and
  - Winthrop Think College.

Each program has an SCVRD counselor liaison who provides services for eligible students. SCVRD counselors monitor progress and assist with transition planning as the student approaches program completion. These efforts support continuity and coordination of services with the SCVRD office located in the student's hometown. These programs provide students with critical competitive employment and independent living skills. SCVRD counselors work closely with staff and students to explore careers, determine a suitable vocational goal, and assist with job placement.

SCVRD continues to explore and develop new initiatives that promote successful post-school outcomes for students with disabilities. These outcomes include competitive, integrated employment, independent living, community participation and postsecondary education.

SCVRD is funding a pilot program in coordination with the University of South Carolina's LIFE program. The intent of this pilot is to develop a model for using ambassadors from an inclusive post-secondary program to work with students with disabilities to share strategies and facilitate a successful transition to post-secondary education. Of the 9 contracts that SCVRD has with school districts to provide Pre-ETS, 6 are geared in particular for those students with most significant disabilities who will not obtain a high school diploma. SCVRD is also contracting with a vendor to provide Pre-ETS utilizing Applied Behavior Analysis (ABA) strategies for students with Autism Spectrum Disorders.

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

Based on the findings in the most recent CSNA, the network of SCVRD area offices, work training centers and comprehensive programs across the state ensure statewide delivery of VR services to all populations in need of VR services.

Some years ago, the need to expand the SCVRD area office and work training center located in Seneca (referred to internally as the Oconee Pickens office) was identified. As stated in the CSNA, Oconee and Pickens counties are largely rural counties that are situated within the Upstate region of the state. That region has experienced extensive growth in many industries such as advanced manufacturing and health care. In combination with interest from employers and legislators, the Oconee Pickens office has been identified as a site needing additional capacity (space) for service delivery staff. In response to WIOA as well as local and regional economic and workforce development needs, it has also been identified as a location requiring expansion of its work training center facility to provide customized and demand-driven training opportunities for consumers. With expansion of the work training center, there will be development of customized and demand-driven trainings that meet the needs of business and industry that have previously been limited due to space. Support for state funding for the project demonstrates the need and interest of the community.

With the expansion of the work training center, acquisition of additional business contracts in advanced manufacturing techniques are subassembly are anticipated. Examples of current contracts include Electrolux - fan assembly; Greenfield Industries - drill bit quality control, sorting, and packaging; Ulbrich - medical spool quality control and sorting; Parkway Products – door fuel inlet automotive assembly; and Schneider Electric – Trip Switches sub assembly.

The purpose of these contracts is to provide job readiness training and skills enhancements for SCVRD consumers that, in turn, meets the needs of employers in the community. It will also allow us a greater ability to work with our business partners on the development of demand driven and customized trainings. One of the strategies included in the SC WIOA state plan is sector partnerships, which are industry-led coalitions focused on a specific employment sector. In the Greater Upstate region, the manufacturing sector partnership has identified an action team to address gaps in middle-skill technical jobs. Capacity for demand-driven and customized trainings that are informed by this industry group will be available through these additional contracts with business. Eligible SCVRD consumers who have been identified on their IPE as needing job readiness training and vocational training in manufacturing will be training on these contracts (job readiness training).

The additional contracts are anticipated to generate approximately \$8640 per month in program income. In accordance with CFR 361.63, program income earned will be used to supplement Federal funds that support SCVRD's program activities.

Per the project plan submitted to the State, the following is a summary of the project:

Design and construct an 8200 square foot addition and 1407 square foot renovation to the existing Work Training Center and production space, clean work room, offices, and storage. This addition will be utilized for additional contract work space used to provide consumers with job readiness training.

Replace the roof of the Oconee/Pickens VR Center Building, consisting of approximately 20,000 square feet of roof deck. Remove approximately 20,000 square feet of existing built up roof. Apply roof insulation and SBS smooth granular surfaced modified bitumen roofing system with associated flashings and metalwork. New roofing system to have a 20-year warranty. Removal and disposal of asbestos containing roofing and flashing materials may be required.

The roof is approximately 29 years old and has exceeded its life expectancy. The addition is needed to increase capacity to serve the growing consumer population in this region, as well as to increase the types of contract work necessary to train our consumers for competitive employment.

SCVRD has historically operated two substance abuse treatment facilities in the state, Holmesview Center in Greenville and Palmetto Center in Florence. Holmesview Center was destroyed in a fire in November of 2016. Plans for rebuilding that Center are currently going through state procedures. Due to aging infrastructure and safety concerns, the Palmetto Center was rebuilt and is in operation. The need for these existing programs has long been established.

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

The goals, strategies, and objectives included in the SCVRD strategic planning template outline the strategies to improve performance of SCVRD with respect to the performance accountability measures under section 116 of WIOA. Specifically, strategies and measures under Goal 1 address participant outcomes, including school-to-work transition and training strategies. Strategies and measures for Goal 4 pertain to partnerships with other agencies and organizations, as well as business and industry.

Based on regular monitoring of performance on WIOA CPMs, including RSA data dashboards, additional staff trainings, technical assistance resources and internal controls are developed to improve understanding, improve service delivery and enhance performance. Additionally, goals have been

established for all Area Offices for measures related to performance accountability measures under section 116 of WIOA.

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

Strategies and measures under Goal 1 address participant outcomes, including school-to-work transition and training strategies. Strategies and measures for Goal 4 pertain to partnerships with other agencies and organizations, as well as business and industry.

## **8. How the agency's strategies will be used to:**

### **A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;**

The goals in the Strategic Planning Template were established based on the findings of the most recent comprehensive statewide needs assessment (as of the development of the Strategic Plan) and are updated annually in conjunction with the agency's strategic planning efforts as well as state-specific reporting requirements. Each goal is tied to a defined strategy and set of objectives, designed to be specific, measurable, attainable, relevant/realistic, and timely. These are long-term planning goals, strategies, and objectives that include, at minimum, annual assessment of results as well as adjustment and revision based on needs of the state and further implementation of WIOA.

### **B. Support innovation and expansion activities; and**

The strategies will support:

- Continued expansion of work-based learning activities for students
- Expansion of Project SEARCH sites
- Enhanced services for individuals with Autism Spectrum Disorders via a cooperative agreement with Project HOPE Foundation, a non-profit organization that provides a lifespan of services and activities for individuals with autism
- Expanded services to incarcerated youth in additional programs operated by DJJ (e.g., Camp Aspen)
- Consistent access to interpreter services for consumers who are deaf in rural areas, and enhanced accessibility of VR productions and consumer and staff training materials through a staff interpreter to provide video remote interpreting and on- site services to mutual consumers of SCVRD and DHHS
- Support to local business development specialists across the state as well as to local and regional business services teams, which are interagency groups that coordinate business services under WIOA, via statewide/regional business specialists

### **C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.**

SCVRD has hired additional job coaches and is working to enhance the partner relationships with DDSN and its network of providers serving the I/DD population. Additionally, the strategies will support:

- Continued expansion of work-based learning activities for students
- Expansion of Project SEARCH sites

- Enhanced services for individuals with Autism Spectrum Disorders via a cooperative agreement with Project HOPE Foundation, a non-profit organization that provides a lifespan of services and activities for individuals with autism
- Expanded services to incarcerated youth in additional programs operated by DJJ (e.g., Camp Aspen)
- Consistent access to interpreter services for consumers who are deaf in rural areas, and enhanced accessibility of VR productions and consumer and staff training materials through a staff interpreter to provide video remote interpreting and on-site services to mutual consumers of SCVRD and DHHS

**p. Evaluation and Reports of Progress: VR and Supported Employment Goals**

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

**A. Identify the strategies that contributed to the achievement of the goals**

The WIOA Common Performance Measures are still in the baseline phase for VR programs, so no performance targets have been set. Performance measures are in place, however, for evaluation of the extent to which the goals identified in the Strategic Planning Template are achieved. The template also indicates the strategies being employed to achieve the goals.

TYPE	GOAL	STRATEGY	OBJECTIVE	DESCRIPTION	PERFORMANCE
G	1			Successful employment outcomes for South Carolinians with disabilities through specialized, individualized services.	PY17: Goal - 6550 successful outcomes, Actual - 6605 (Goal Met) PY18: Goal - 5000 successful outcomes, Actual - 4930 (Not Met - 98.6%)
S		1.1		Improve the quality of employment outcomes for eligible individuals with disabilities.	Employment Rate Q2 post-exit: PY16 - 53.48% PY17 - 56.16% Employment Rate Q4 post-exit: PY16 - 52.20% PY17 - 54.53% Median Earnings Q2 post-exit: PY16 - \$3882 PY17 - \$4055 (Improved on each measure)

## VI. PROGRAM-

Type	Goal	Strategy	Objective	Description	Performance
O			1.1.1	Support continuous improvement within Program Integrity: Productivity, Compliance Assurance and Customer Service	PY16: Productivity - 100.09% Compliance - 93.06% Customer Service - 97.44% PY17: Productivity - 100.84% Compliance - 94.43% Customer Service - 99.07% PY18: Productivity - 98.60% Compliance - 95.93% Customer Service - 99.32% (Improved for Productivity in PY17, Compliance PY17&18, Customer Service PY17&18)
O			1.1.2	Increase services to underserved and emerging disability populations.	No target measure specified
O			1.1.3	Strengthen the workforce pipeline through matching client strengths and abilities with community employment results.	No target measure specified
O			1.1.4	Demonstrate effectiveness in national comparative data for performance measures.	MSG rate for PY 2018: 28.3% vs 25.3% national rate for general programs
S		1.2		Enhance school-to-work transition services.	Number of TSS agreements with schools has increased from 5 to 21
O			1.2.1	Maximize relationships with education officials in all SC school districts to support development of education and career pathways.	No target measure specified

## VI. PROGRAM-

Type	Goal	Strategy	Objective	Description	Performance
O		1.2.2		Improve services to individuals with autism spectrum disorders and intellectual/developmental disabilities.	Rehabilitation Rate – Autism: PY16 = 50.8% PY17 = 49.8% PY18 = 50.8% Rehabilitation Rate – Intellectual Disability: PY16 = 44.4% PY17 = 47.6% (Improved) PY18 = 39.3%
O		1.2.3		Enhance services for at-risk youth with disabilities.	Exceeded goals for Jobs for America's Graduates (JAG) - Out of School grant; Personnel upgraded and Florence office referral development strengthened for DJJ agreement
O		1.2.4		Expose students with disabilities to careers in science, technology, engineering and math through High School/High Tech programs.	High School/ High Tech discontinued with implementation of Pre-ETS
O		1.2.5		Provide pre-employment transition services to prepare students for postsecondary outcomes.	No target measure specified
S	1.3			Enhance job-driven vocational training programs.	No target measure specified
O		1.3.1		Develop job-readiness skills through work training center activities, demand-driven skills training, and on-the-job supports.	No target measure specified
O		1.3.2		Equip clients for job search through resume development, interviewing skills, other "soft" skills and disability-related classes.	No target measure specified

## VI. PROGRAM-

Type	Goal	Strategy	Objective	Description	Performance
O			1.3.3	Develop customized training opportunities that align with employer-identified skill sets.	No target measure specified
G	2			We will be a team of highly qualified professionals who have the commitment, accountability, and opportunity to excel.	No target measure specified
S		2.1		Provide training to equip staff to provide quality vocational rehabilitation services.	No target measure specified
O			2.1.1	Develop training based on needs assessment in accordance with the Unified State Plan.	No target measure specified
O			2.1.2	Enhance job-specific training for specialized areas of agency operations.	No target measure specified
S		2.2		Foster opportunities for professional growth and the enhancement of future leadership.	No target measure specified
O			2.2.1	Provide a professional development and leadership program.	No target measure specified
O			2.2.2	Maintain a working environment that fosters measurable increases in job satisfaction and rewards accomplishment.	No target measure specified
O			2.2.3	Structure a work environment that promotes employee accountability for performance and ethical standards.	No target measure specified
G	3			Accountability to taxpayers through efficient and effective use of resources entrusted to us.	No target measure specified

## VI. PROGRAM-

Type	Goal	Strategy	Objective	Description	Performance
S		3.1		Successful outcomes for clients and claimants using resources efficiently.	No target measure specified
O			3.1.1	High return on investment for clients through successful employment outcomes.	No target measure specified
O			3.1.2	Demonstrate cost-effectiveness that compares favorably with national/regional peers.	No target measure specified
S		3.2		Continued evaluation and improvement of key processes.	No target measure specified
O			3.2.1	Conversion to electronic case management system encompassing time management and compliance aids with statewide access.	No target measure specified
O			3.2.2	Expansion and enhancement of quality assurance and program evaluation to support data-driven decision-making and evaluation methods.	No target measure specified
O			3.2.3	Evaluation and development of fiscal and programmatic joint processes.	No target measure specified
S		3.3		Ensure safety and adequacy of infrastructure.	No target measure specified
O			3.3.1	I.T. and systems security.	No target measure specified
O			3.3.2	Promote a safe environment for staff and clients, resulting in minimal rates of injury.	The experience modifier (EMOD) for workers compensation insurance premiums improved from 1.05 in PY17 to 1.02 in PY18 and 1.00 in PY19.
G	4			Maintain a dynamic network of partnerships to shape a better future for all stakeholders.	Existing agreements have been renewed, and additional agreements entered into for Pre-ETS and interagency initiatives.

## VI. PROGRAM-

Type	Goal	Strategy	Objective	Description	Performance
S		4.1		Increase collaboration with other state agencies and community organizations.	No target measure specified
O			4.1.1	Inform stakeholders of services and get their feedback on VR performance in meeting needs.	No target measure specified
O			4.1.2	Provide employment preparations and supports for people with disabilities referred by partner agencies and organizations.	No target measure specified
O			4.1.3	Build relationships that encourage complementary interagency collaboration.	No target measure specified
S		4.2		Mutually beneficial partnerships with business and industry that provide employment/training opportunities for clients.	No target measure specified
O			4.2.1	Build and maintain VR Business Partnership Network and collaborate with business and industry associations.	No target measure specified
O			4.2.2	Actively use business advisory councils for guidance on employment standards and training curricula.	No target measure specified
O			4.2.3	Advanced solutions for job matching through Career Connect and Universal Business Database.	No target measure specified
O			4.2.4	Provide outsource opportunities that meet clients' job readiness training needs and local labor market and industry needs.	No target measure specified

### B. Describe the factors that impeded the achievement of the goals and priorities

Factors that impeded the achievement of goals and priorities, or resulted in a necessary shift in goals and priorities during the year, include the active management of employee attrition to reduce our expenditures while maintaining an appropriate level of service delivery to our

consumers. In addition, we continue to make adjustments and programmatic changes required for full implementation of requirements under WIOA.

**2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:**

**A. Identify the strategies that contributed to the achievement of the goals**

Strategies that contributed to the achievement of overall goals and specific objectives included:

- Review and measurement of key performance indicators on a quarterly basis.
- Monthly monitoring and specialized reporting on the results of outreach efforts to underserved and emerging disability populations.
- Monthly monitoring and specialized reporting on services to youth and Pre-Employment Transition Services.
- Dedicated staff for specific populations and specialized services: school-to-work transition; deaf and hard of hearing; supported employment.
- Demonstration programs to enhance supported employment services and services for youth with the most significant disabilities, individuals diagnosed with ASD, and demand-driven training based on community labor market information.

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

Factors that impeded the achievement of goals and priorities, or resulted in a necessary shift in goals and priorities during the year, include the active management of employee attrition to reduce our expenditures while maintaining an appropriate level of service delivery to our consumers. In addition, we continue to make adjustments and programmatic changes required for full implementation of requirements under WIOA.

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

The WIOA Common Performance Measures are still in the baseline phase for VR programs. Performance data for these measures are being collected and reviewed regularly.

Per the RehabData Workgroup dashboard, the PY18 Measurable Skill Gains rate for SCVRD was 30.2%, which exceeded the national average for General VR agencies (25.3%). In-house data show that in PY18, SCVRD consumers enrolled in education and training programs attained 761 recognized credentials.

The most recent post-exit employment and earnings data (cases closed in PY17) are as follows:

Employment Rate Q2: 56.16%

Employment Rate Q4: 54.53%

Median Earnings Q2: \$4,055

Although the Employer Penetration Rate and Repeat Business Customers Rate are shared measures across the core partners, SCVRD tracks these same measures for our Agency. For PY18, SCVRD's Employer Penetration Rate was 0.5%, and its Repeat Business Customers Rate was 10.9%.

**4. How the funds reserved for innovation and expansion (I&E) activities were utilized**  
Innovation and expansion activities have been identified within these strategies and include:

- Continued expansion of work-based learning activities for students

- Expansion of Project SEARCH sites
- Cooperative agreement with Project HOPE Foundation, a non-profit organization that provides a lifespan of services and activities for individuals with autism
- Maintaining a full-time counselor to provide vocational rehabilitation services to incarcerated youth, which has expanded to include additional programs operated by DJJ (e.g., Camp Aspen)
- Maintaining a staff interpreter for consumers who are deaf to provide video remote interpreting, on- site services to mutual consumers of SCVRD and DHHS, extend consistent access to interpreter services in rural areas, and enhance the accessibility of VR productions and consumer and staff training materials
- On-The-Job training services
- Maintaining statewide/regional business specialists who provides support to local business development specialists across the state as well as providing support to local and regional business services teams, which are interagency groups that coordinate business services under WIOA
- Upgrades and continued development of job readiness training services, including an electronic MAP (My Action Plan) document, which is an individualized plan for job readiness training, and development of demand-driven skills training opportunities
- Continued development of business database systems (Universal Business Database) to enhance consumer service delivery, career placement activities, and benchmarking services to employers

#### *q. Quality, Scope, and Extent of Supported Employment Services*

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Include the following:

**1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities**

SCVRD employs 35 full-time job coaches having a high school diploma or a bachelor's degree in a related field. In addition, SCVRD employs 14 transition job coaches who provide supported employment services to youth with the most significant disabilities.

Job coaches work as part of a team along with other SCVRD staff and extended support representatives. Through the efforts of these job coaches, supported employment services are available statewide to individuals with the most significant disabilities.

Supported Employment Services are provided to individuals with the most significant disabilities and the youth with the most significant disabilities, when the consumer is placed into employment and require ongoing supports to successfully maintain employment. Supported employment services, are also identified on the IPE, and begin at the time of the individual's job placement.

SCVRD's ongoing support services are limited to 24 months unless extended by an amendment to the IPE. Transition to extended services starts after an individual is stabilized in his/her job setting and has met the individualized work goal. The consumer's employment stability is determined by the achievement of adequate job performance without a need for ongoing, intensive shadowing/mentoring from the job coach. The consumer, employer, job coach, and SCVRD counselor agree that this has occurred before transition to the extended service provider takes place. SCVRD continues to leverage resources for identifying extended service providers to meet long-term support needs. Extended

services providers are identified in each area. Partnerships at the state and local level with DDSN and its network of providers continue to grow and provide key linkages to extended services providers. Planning for extended services is done in advance, such that service provision can be authorized timely and allow for a seamless transition from VR services to the extended services. Typically, and as determined by the consumer's supported employment needs, there is an intensive job coaching period of two to six weeks beginning at the time of job attainment. This is followed by ongoing, though less intensive, job coach involvement of at least 90 or more days prior to determining whether the consumer is ready for extended services. In addition, SCVRD may provide post-employment services following transition if needed to maintain the placement.

The overall objective for each individual receiving supported employment services is successful competitive employment in an integrated work setting. For this to occur, the supported employment team works to assure consumer and employer satisfaction in terms of both production and fulfillment of the individual's needs.

Emphasis is placed upon providing services to people with most significant disabilities, especially SSI and/or SSDI recipients, whose employment needs are so significant that traditional 110 program services would not be sufficient to meet them. SCVRD coordinator of supported employment services also assists area office staff to identify and serve all eligible consumers with the most significant disabilities.

## 2. The timing of transition to extended services

Transition to extended services starts after an individual is stabilized in his/her job setting and has met the individualized work goal. The consumer's employment stability is determined by the achievement of adequate job performance without a need for ongoing, intensive shadowing/mentoring from the job coach. The consumer, employer, job coach, and SCVRD counselor agree that this has occurred before transition to the extended service provider takes place. SCVRD continues to leverage resources for identifying extended service providers to meet long-term support needs. Extended services providers are identified in each area. Partnerships at the state and local level with DDSN and its network of providers continue to grow and provide key linkages to extended services providers. Planning for extended services is done in advance, such that service provision can be authorized timely and allow for a seamless transition from VR services to the extended services provider's follow along.

Typically, and as determined by the consumer's supported employment needs, there is an intensive job coaching period of two to six weeks beginning at the time of job attainment. This is followed by ongoing, though less intensive, job coach involvement of at least 90 or more days prior to determining whether the consumer is ready for extended services. In addition, SCVRD may provide post-employment services following transition if needed to maintain the placement.

## *Vocational Rehabilitation (Combined or General) Certifications*

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];

Enter the name of designated State agency or designated State unit, as appropriate  
South Carolina Vocational Rehabilitation Department

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17] , the Rehabilitation Act, and all applicable regulations[18] , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

Enter the name of designated State agency  
South Carolina Vocational Rehabilitation Department

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19] , the Rehabilitation Act, and all applicable regulations[20] , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below  
Felicia W. Johnson

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below  
Commissioner of the South Carolina Vocational Rehabilitation Department

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

#### Footnotes

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

#### Certification Signature

SIGNATORY INFORMATION	ENTER SIGNATORY INFORMATION IN THIS COLUMN
NAME OF SIGNATORY	Felicia W. Johnson
TITLE OF SIGNATORY	Commissioner, South Carolina Vocational Rehabilitation Department
DATE SIGNED	March 30, 2020

#### Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

THE STATE PLAN MUST INCLUDE	INCLUDE
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	
a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
(A) "is an independent State commission" (Yes/No)	Yes
(B) "has established a State Rehabilitation Council" (Yes/No)	No
c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	

THE STATE PLAN MUST INCLUDE	INCLUDE
i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act	

**THE STATE PLAN MUST INCLUDE****INCLUDE**

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs</li> <br/> <li>j. With respect to students with disabilities, the State,           <ul style="list-style-type: none"> <li>i. Has developed and will implement,               <ul style="list-style-type: none"> <li>I. Strategies to address the needs identified in the assessments; and</li> <li>II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and</li> </ul> </li> <br/> <li>ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))</li> </ul> </li> </ul>   |  |
| <p>5. Program Administration for the Supported Employment Title VI Supplement:</p> <ul style="list-style-type: none"> <li>a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act</li> <br/> <li>b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act</li> <br/> <li>c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act</li> </ul>  |  |
| <p>6. Financial Administration of the Supported Employment Program:</p> <ul style="list-style-type: none"> <li>a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act</li> <br/> <li>b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act</li> </ul> |  |

THE STATE PLAN MUST INCLUDE	INCLUDE
<p>7. Provision of Supported Employment Services:</p> <ul style="list-style-type: none"> <li>a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act</li> <li>b. The designated State agency assures that: <ul style="list-style-type: none"> <li>i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act</li> <li>ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act</li> </ul> </li> </ul>	Yes

### *Vocational Rehabilitation Program Performance Indicators*

#### *Performance Goals for the Core Programs*

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATE D LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
CREDENTIAL ATTAINMENT RATE	Baseline	Baseline	Baseline	Baseline
MEASURABLE SKILL GAINS	14.0%	22.0%	17.2%	23.0%
EFFECTIVENESS IN SERVING EMPLOYERS	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

## Program-Specific Requirements for Vocational Rehabilitation (Blind)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

[13] Sec. 102(b)(2)(D)(iii) of WIOA

### a. Input of State Rehabilitation Council

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

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

The South Carolina Commission for the Blind (SCCB) is an independent consumer-controlled commission with a Governor appointed State Board that provides governance and program guidance, and as such is not required to submit this section. The results of the 2016 Comprehensive Statewide Assessment of Rehabilitation Needs and subsequent State Plan submissions have been reviewed and approved by the SCCB Board of Commissioners.

2. The designated State unit's response to the Council's input and recommendations; and
- The South Carolina Commission for the Blind (SCCB) is an independent consumer-controlled commission with a Governor appointed State Board that provides governance and program guidance, and as such is not required to submit this section. The results of the 2016 Comprehensive Statewide Assessment of Rehabilitation Needs and subsequent State Plan submissions have been reviewed and approved by the SCCB Board of Commissioners.

**3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.**

The South Carolina Commission for the Blind (SCCB) is an independent consumer-controlled commission with a Governor appointed State Board that provides governance and program guidance, and as such is not required to submit this section. The results of the 2016 Comprehensive Statewide Assessment of Rehabilitation Needs and subsequent State Plan submissions have been reviewed and approved by the SCCB Board of Commissioners.

***b. Request for Waiver of Statewideness***

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When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

**1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;**

SCCB is not requesting a waiver of statewideness.

**2. The designated State unit will approve each proposed service before it is put into effect; and**

SCCB is not requesting a waiver of statewideness.

**3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.**

SCCB is not requesting a waiver of statewideness.

***c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System***

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Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

**1. Federal, State, and local agencies and programs;**

SCCB has developed and signed Cooperative Agreements with the following agencies:

- South Carolina Department of Health and Human Services (DHHS) to create administrative efficiencies and improve services to consumers statewide;
- South Carolina Worker's Compensation Commission (WCC) to facilitate the referral process of injured workers to SCCB to enhance return-to-work efforts;
- Social Security Administration (SSA) to collaborate on employment incentives and supports and maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program;
- South Carolina Office of Veterans' Affairs (OVA) to help identify veterans who need additional supports in securing benefits, gaining employment, and accessing advocacy services;
- South Carolina Department of Disabilities and Special Needs (DDSN) to eliminate potential duplication of services and increase coordination of employment services provided to the shared consumer populations;

- South Carolina Department of Social Services (DSS) to eliminate duplication of services and increase coordination of employment services provided to the shared consumer populations;
- South Carolina Department of Mental Health to collaborate, coordinate, eliminate potential duplication of services, and enhance the employment outcomes of shared consumer populations.

**2. State programs carried out under section 4 of the Assistive Technology Act of 1998;**  
SCCB has a cooperative agreement with the South Carolina Assistive Technology Program at the University of South Carolina School of Medicine to access comparable benefits, eliminate duplication of services, and increase coordination of employment services provided to shared consumer populations.

**3. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;**

SCCB has developed partnerships with the local office of the U.S. Department of Agriculture to develop cooperative efforts to provide services to South Carolinians who are blind or visually impaired.

**4. Non-educational agencies serving out-of-school youth; and**

Non-educational agencies serving out of school youth participate in South Carolina's statewide workforce development system and are partnered with through the provisions of the Unified State Plan and the Workforce Development System.

**5. State use contracting programs.**

No such State Use Contracting Program exists in South Carolina.

#### *d. Coordination with Education Officials*

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Describe:

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

SCCB has a current and updated Cooperative Agreement with the South Carolina Department of Education, and has local area Memorandum of Understandings with Local Education Authorities (LEA's). Coordination with education officials is accomplished on three (2) distinct levels of the SCCB service delivery process.

These two levels include:

**SCCB Career BOOST (Building Occupational Opportunities for Students in Transition):** Is a contractual program in partnership with South Carolina's Independent Living Centers, the National Federation of the Blind of South Carolina, and LEA's. Pre- Employment Transition Services are provided to eligible and potentially eligible students, aged 13 to 21, with visual disabilities. These services include Self-Advocacy Workshops, Work Readiness Soft Skills Workshops, Exploration of Higher Education through College Tours, and Work Based Learning Experiences.

**SCCB Vocational Rehabilitation Program:** This program serves students from age 13 through 21. SCCB has three (3) dedicated Transition Vocational Rehabilitation Counselors statewide building program infrastructure and education relationships to improve services to Transition Students. The Transition Counselors primarily collaborate with education officials such as the South Carolina Department of

Education, LEA's, the South Carolina School for the Deaf and Blind (SCSDB) and the South Carolina Department of Disabilities and Special Needs (SCDDSN).

In an effort to address the assistive technology needs of college bound transition consumers, SCCB sponsors an annual Technology Day. The need for this initiative arose due to an increase in the number of blind and visually impaired students who were failing college courses due to an inability to take notes and complete assignments. During technology day, consumers are assessed and trained on the latest assistive technology software and equipment. Assistive technology recommendations for each student are contingent upon the level of blindness, skill level and school requirements. Technology Day is conducted by the SCCB Training and Employment Department.

Additionally, SCCB is an active member of the [Transition Alliance of South Carolina \(TASC\)](#). TASC supports local interagency transition teams by providing resources to increase collaboration, partnerships, coordination, and effectiveness in serving students with disabilities transitioning from high school to adult-life. SCCB also participates in the [SC Vision Education Partnership](#) where public educators for the blind and visually impaired collaborate and coordinate with SCCB Transition VR staff. SCCB is an active member of the [Employment First Initiative](#) steering committee, an interagency partnership focused on ensuring that competitive integrated employment is the first priority for transition aged students with disabilities. SCCB is also an active member of the [Advisory Council for Educating Students with Disabilities](#) an advisory council for the Office of Special Education at the South Carolina Department of Education. All of these committees and councils create avenues for coordination and collaboration with state and local education officials.

SCCB conducts semiannual meetings with the statewide vision teachers in an effort to facilitate the coordination of services to the most significantly disabled students and their need for supported employment services. Discussions include, but are not limited to, collaboration with SCDDSN, SCDOE and the SCSDB to coordinate transition services. The main source of referrals to the Transition Counselors is the school district.

Procedures for outreach to, and identification of blind and visually impaired students include, but are not limited to, the utilization of SCCB program data, statistical data from the Data Analysis System of the US Department of Education (Office of Special Education) and the American Community Survey data. An annual analysis of the data from these sources identifies the location of transition aged unserved and underserved individuals.

SCCB and SCVRD have aligned our age range for pre-employment transition services and VR transition services with the SC Special Education age ranges. SCCB provides pre-employment transition services to students aged 13 to 21. The same age range is applied to youth for VR transition services.

## 2. Information on the formal interagency agreement with the State educational agency with respect to:

- A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

SCCB has a formal Cooperative Agreement with the South Carolina Department of Education that specifically includes provisions for: (A) mutual consultation and technical assistance to assist educational agencies and SCCB in planning for the transition of students with disabilities from school to post-school activities, including VR services. This Agreement was formally approved by all parties on August 11, 2017 for a period of 5 years. The agency has also entered into Memorandum of Understanding with Local Education Agencies (LEA's) that builds our partnerships with public schools. In addition, SCCB is engaged in the [Transition Alliance of South Carolina](#) where educational partners coordinate, collaborate and provides technical expertise on regionally based transition teams. Finally, SCCB has been an active partner in the

**South Carolina Vision Education Partnership** that brings Blind and Visual Impairment Educators and VR Transition Counselors together for collaborative training, team building, and technical assistance.

Regarding the formal interagency agreement; the vocational rehabilitation services portion of the Unified or Combined State Plan must include information on a formal interagency agreement with the State educational agency that, at a minimum, provides for coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 with regard to students and youth with disabilities who are seeking subminimum wage employment. This process will include, at minimum, the following actions:

- A. Utilization of a consistent checklist coversheet by the SCCB, the SCDE and school districts identifying the required documentation being requested and transmitted by school districts;
- B. Provision of documentation of the receipt and, if applicable, completion of transition services under the IDEA by the school district for any student seeking to enter work that is compensated at a subminimum wage. This will include a copy of the most recent IEP and Summary of Performance;
- C. Provision of documentation by the school district of a student's refusal to participate in transition services under the IDEA, if applicable;
- D. Retention by the school district of a copy of all documentation provided to the SCCB in accordance with 2 C.F.R. 200.333, and
- E. Adherence by the school district to the required timeframes for transmittal of documentation to the SCCB as outlined in the WIOA no more than thirty (30) calendar days after completion of the transition service, or no more than sixty (60) calendar days after completion of the transition service if additional time is needed due to extenuating circumstances, or within five (5) calendar days of the student's refusal to participate in transition services.

The SCCB and SCDE will continue to develop data sharing agreements that support the required data elements for students receiving pre-employment transition services under section 113 of the WIOA and section 116 of the Act which defines performance accountability reporting requirements.

**B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;**

SCCB has a current Cooperative Agreement with the South Carolina Department of Education and Local Education Agencies that includes provisions for transition planning by personnel of the designated state agency and educational agency that facilitates the development and completion of their individualized education programs. SCCB provides technical expertise, assistive technology assessments, and Pre-Employment Transition Services to students in cooperation and collaboration with educational entities. The Career BOOST program provides the 5 required Pre-Employment Transition Services in classrooms through a partnership with local public schools and educators.

Transition Counselors develop the initial Individualized Plan of Employment (IPE) and provide Pre-ETS services with a focus on Job Exploration Counseling while the consumer is enrolled in secondary or post-secondary education and is between the ages of 13 through 21. The IPE includes services pertaining to the adjustment, prevention or stabilization of vision, and Pre-

Employment Transition Services as defined in the Workforce Innovation and Opportunities Act (WIOA).

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

SCCB has a current formal written Cooperative Agreement with the South Carolina Department of Education and LEA's that includes provisions for clarity of roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services.

In an effort to avoid the duplication of services, low vision and assistive technology needs are coordinated with local school districts in accordance with the student's Individualized Education Plan (IEP) and IPE. In such instances, the alternative service providers and funding sources will be identified on the IPE and coordinated accordingly

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

SCCB has a current formal written Cooperative Agreement with the South Carolina Department of Education and LEA's that includes provisions for procedures for outreach to and identification of students with disabilities who need transition services. SCCB is an active partner in the Transition Alliance of South Carolina (TASC) where VR Transition Counselors partner with local educators who assist in the identification and referral of potentially eligible students who need transition services. SCCB involvement in the South Carolina Vision Education Partnership also creates relationships with educators who refer potentially eligible students to SCCB. SCCB's Career BOOST Program in partnership with LEA's identifies and provides Pre-Employment Transition Services to eligible and potentially eligible students with disabilities and makes referrals to SCCB and SCVRD when comprehensive transition services may be needed. Finally, SCCB staff participate in parent outreach, information, and referral events.

#### **e. Cooperative Agreements with Private Nonprofit Organizations**

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

SCCB has actively established Cooperative Agreements and community partnerships. SCCB is committed to being an active, cooperative and collaborative partner with community entities wherever such reciprocal relationships can benefit consumers and enhance the effectiveness and efficiency of the VR program. SCCB has developed and maintains Cooperative Agreements with the following entities not carrying out activities under the Statewide Workforce Development System:

- The National Federation of the Blind (NFB) of South Carolina for the purposes of ensuring statewide availability of adjustment to blindness training, job readiness and computer skills training, independent living skills training.
- The Association for the Blind and Visually Impaired (ABVI) for the purposes of ensuring statewide availability of adjustment to blindness training, job readiness and computer skills training, and independent living skills training.
- South Carolina Association of the Deaf, Inc.
- Goodwill Industries for the purposes of providing statewide access to job readiness and computer skills training.

- The Helen Keller National Center (HKNC) for the purpose of expanding training options for consumers who are Deaf/Blind and need training beyond the scope of programs provided at the Ellen Beach Mack Rehabilitation Center for Employment and Independence (EBMRCEI).
- Informal partnerships with community-based partners such as faith-based organizations, charitable organizations, and non-governmental community-based organizations.
- Community Rehabilitation Programs providing Orientation and Mobility, Home Management, and Braille Instruction on a fee-for-service basis.

#### *f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services*

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

SCCB has established an internal Supported Employment program that includes Customized Employment provided by three (3) regionally assigned JOBS Specialists. SCCB has signed a Partnership Plus Agreement with ABLE SC under provisions in the Ticket- to-Work program to provide ongoing supports. SCCB is working to establish other Cooperative Agreements with entities providing ongoing supports to consumers in Supported Employment.

SCCB is a member of the SC Disability Employment Coalition and participates in roundtable discussions to develop methods for maximizing services to consumers through our partnerships with other agencies. SCCB is currently negotiating an agreement with the Department of Mental Health (DMH). The agreement is in preliminary stages and is not finalized, however, the goal of the agreement is to outline mutual referral practices, provide complimentary job placement services, and provide long-term mental health support to employed SCCB consumers, even after exit from the VR program. SCCB is also in preliminary discussions with the Developmental Disability and Special Needs (DDSN) agency. Thus far discussions have centered around data collection. SCCB has provided information regarding how many consumers may require assessment for DDSN services, and how many consumers are currently receiving DDSN services. SCCB is hopeful that DDSN will continue to pursue this partnership to the benefit of our mutual consumers.

#### *g. Coordination with Employers*

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Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

##### **1. VR Services; and**

SCCB actively engages with the South Carolina business community through services provided by the Training & Employment Division (T&E) Employment Consultants. Both Employment Consultants and VR Counselors participate in local workforce boards. SCCB T&E Employment Consultants build and maintain partnerships with businesses to:

- Assess and better understand the unique human resource needs of South Carolina businesses;
- To help align SCCB programs to better meet the unique and specific human resource needs of South Carolina businesses;

- To create, establish, and foster relationships with South Carolina businesses that help them meet their unique and specific human resource needs, including talent acquisition and talent retention;
- Develop opportunities for Work Based Experiences, Internships, Job Shadowing, and other work-based learning experiences that provide South Carolina Businesses with opportunities to gain experience with a diverse and qualified workforce;
- Create mutually beneficial relationships and facilitate linkages of job openings to a highly skilled and diverse talent pool of candidates. Referrals of consumers who are seeking employment and who have been judged to be Job Ready are received from SCCB Vocational Rehabilitation Counselors. The Employment Consultant's role is job development and placement that meets the needs of the business and the consumer. The Consultant also provides businesses and consumers with access to services that can be provided by SCCB or other governmental agencies. Incentives that may be applicable are also presented. These include:
  - The Work Opportunity Tax Credit (WOTC). This program allows a maximum available credit of \$2,400 per eligible worker.
  - Sensitivity and awareness training for employers and organizations. This training includes American Disability Act (ADA), sighted guide techniques and attitudes regarding blindness. The presentation is designed to remove myths and apprehensions about blindness.
  - Technical assistance for the implementation and support of assistive technology.
- SCCB T&E Division also employs Assistive Technology Consultants (AT Consultants) who work directly with businesses and consumers to:
  - Provide assessment and technical assistance in the provision of work place modifications and/or assistive technology solutions considered reasonable accommodations that enable a consumer who is blind to become an asset to the business partner;
  - Make recommendations for software and/or other equipment which would enable the consumer to successfully engage in employment;
  - Creates customized software solutions which may be necessary to allow the consumer to access computer systems effectively;
  - Recommends the purchase of required equipment and/or software to the Vocational Rehabilitation Counselor; and,
  - Oversees the delivery and installation of this equipment on the work site and provides the consumer training on any specialized applications.

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

SCCB coordinates the **Summer Internship Program (SIP)** in collaboration with business to match a college aged Junior or Senior with a paid internship over the summer. This highly successful program also includes transition students in our **Summer Internship Program Jr. (SIP Jr.)** where transition students in their Junior and Senior year of High School are matched with internships in local businesses where they gain work experience, conduct career exploration, and establish relationships with employers. SCCB supports the employers by funding the paid internship, providing assistive technology or other workplace accommodations, providing technical assistance and ADA compliance information, and helping workplaces become more diversified and accessible.

**SCCB Career BOOST (Building Occupational Opportunities for Students in Transition):** Is a contractual program in partnership with South Carolina's Independent Living Centers, the National Federation of the Blind of South Carolina, and LEA's. Pre-Employment Transition Services are provided to eligible and potentially eligible students with disabilities. These services include Self-Advocacy Workshops, Work Readiness Soft Skills Workshops, Exploration of Higher Education through College Tours, and Work Based Learning Experiences in partnership with the business community.

### *h. Interagency Cooperation*

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Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

#### **1. The State Medicaid plan under title XIX of the Social Security Act;**

SCCB will be working to develop a new Cooperative Agreement with the South Carolina Department of Health and Human Services (DHHS), the state agency responsible for administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.). This Cooperative Agreement will outline the roles and responsibilities of all parties regarding the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program as applicable to South Carolina.

#### **2. The State agency responsible for providing services for individuals with developmental disabilities; and**

SCCB is developing an updated Cooperative Agreement with the South Carolina Department of Disabilities and Special Needs (DDSN) to avoid duplication of services, increase coordination of employment services provided to the shared consumer populations, and to enhance Supported Employment programs.

#### **3. The State agency responsible for providing mental health services.**

SCCB is developing a new Cooperative Agreement with the South Carolina Department of Mental Health to collaborate, coordinate, avoid duplication of services, and enhance the employment outcomes of shared consumer populations.

### *i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development*

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Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

#### **1. System on Personnel and Personnel Development**

##### **A. Qualified Personnel Needs**

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

###### *i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;*

Staffing patterns are set through a joint effort of the SCCB Commissioner, Director of Consumer Services, Senior Management staff as appropriate, and Regional Directors.

## VI. PROGRAM-

In an effort to assess current staffing and hiring needs, SCCB analyzes the following data on an annual basis:

1. Rate of consumer referrals to the VR Program
2. Ratio of VR Counselors to consumers certified eligible for VR services
3. Ratio of VR Counselors to consumers served
4. State Demographic Trends (Incidence of Blindness, Population estimates)
5. Employment/Unemployment data trends
6. Current and projected monetary resources

The SCCB VR program received 640 new referrals during FFY 2019 and served a total of 1,144 eligible consumers. This represented a consumer to VR Counselor ratio of 71.5 to 1.

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

The following table illustrates numbers of VR staff broken down by job title, current vacancies, and projected vacancies over the next five (5) years. Staffing patterns are continuously evaluated by SCCB administration in an effort to make projections for future capacity to provide quality vocational rehabilitation services.

ITEM NUMBER	JOB TITLE	NUMBER OF POSITIONS	CURRENT VACANCIES
1	VR Counselors	13	0
2	Transition VR Counselors	3	0
3	VR Assistants	9	1
4	Employment Consultants (job placement)	3	1
5	Counselor Trainer	1	1
6	Jobs Oriented Blind Specialists (Supported Employment)	3	0
7	Rehab Instructors	16	0
8	Nurse	1	1
9	Quality Assurance Reviewer	1	0
10	Other Staff, Drivers, BEP, and Support Staff	33	4
<b>TOTALS</b>		<b>84</b>	<b>8</b>

*iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.*

## VI. PROGRAM-

ITEM NUMBER	JOB TITLE	NUMBER OF POSITIONS	CURRENT VACANCIES
1	VR Counselors	13	3
2	Transition VR Counselors	3	1
3	VR Assistants	9	2
4	Employment Consultants (job placement)	3	1
5	Counselor Trainer	1	0
6	Jobs Oriented Blind Specialists (Supported Employment)	3	1
7	Rehab Instructors	16	3
8	Nurse	1	1
9	Quality Assurance Reviewer	1	0
10	Other Staff, Drivers, BEP, and Support Staff	33	6
<b>TOTALS</b>		<b>84</b>	<b>18</b>

### B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

- i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;*

SCCB maintains relationships with the University of South Carolina and South Carolina State University, both of which produce graduates who have Master of Rehabilitation Counseling degrees. In addition, SCCB has developed an agreement to provide internship opportunities to Alabama State University Master of Rehabilitation Counseling students.

SCCB has set a Comprehensive System of Personnel Development (CSPD) standard that requires potential VR Counselors to hold a Master's degree in Rehabilitation Counseling or a related field.

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

INSTITUTION	NUMBER OF STUDENTS CURRENTLY ENROLLED IN MRC	NUMBER OF STUDENTS GRADUATED WITH MRC IN THE PREVIOUS YEAR
UNIVERSITY OF SOUTH CAROLINA	40	12
SOUTH CAROLINA STATE UNIVERSITY	45	27

*iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.*

South Carolina State University Rehabilitation Counseling Program had 27 graduates from the previous year. The University of South Carolina Rehabilitation Counseling Program had 12 graduates during the previous year.

## 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

SCCB has established a plan for the recruitment, preparation, and retention of qualified VR Counselors. This plan consists of the following areas of focus:

**Recruitment:** SCCB maintains relationships with graduate training programs that are Council on Rehabilitation Education (CORE) accredited located at the University of South Carolina and South Carolina State University. SCCB's recruitment plan ensures recruitment activities are conducted at all South Carolina schools that have graduates in Vocational Rehabilitation Counseling. In addition, SCCB has written agreements with Alabama State University to provide internships to master's degree students as part of our recruitment efforts. SCCB also utilizes social media and other online job posting sites to advertise vacant positions. The University of South Carolina and South Carolina State University prepare individuals for graduate degrees in VR Counseling. SCCB conducts outreach efforts to these universities and other universities to include: publications and distribution of targeted recruiting material, attendance at career days and job fairs, and recruitment events. In addition, practicum placements and internships are offered to students who are in CSPD qualifying programs. These efforts are designed to recruit qualified personnel, including minority graduates and those with disabilities. SCCB has been especially successful in recruiting personnel from the SC institutions, particularly those from minority backgrounds. Students from these programs and out-of-state programs are encouraged to accept internships and practicum placements with the Commission.

**Preparation:** Staff preparation begins with SCCB's high standards for professional education and professional certification that occurs primarily prior to employment with the agency. SCCB assists eligible staff with costs related to obtaining and renewing CRC Certification and obtaining a Master's in Rehab Counseling. All new staff are required to attend and complete SCCB's New Employee Orientation program that provides basic preparation and onboarding. Further professional training and development occurs with the direct supervisor, and SCCB actively engages staff in ongoing professional preparation and development. SCCB uses a system for staff evaluation that is available to all state employees. The system focuses on the individual employee's job duties compared to stated goals and objectives. These goals and objectives are identified and discussed with the employee at the beginning of the rating period. Ongoing communication between the employee and supervisor clarifies the employee's understanding of how to meet the performance standards and enhances service delivery to the consumer. At the conclusion of the rating period, an evaluation is performed to rate the employee on each duty in relation to performance objectives. The system provides for employee input into the development of the goals and objectives in order to support successful performance. Another feature of the system allows objectives to be amended throughout the review period. This system provides a mechanism for helping a substandard performer improve

and a means of removing an employee from a position should performance not improve to an acceptable level.

**Retention:** SCCB takes an active role in employee/employer relations and encourages communication between field staff and senior management through a suggestion box, SCCB newsletter, and quarterly VR conference calls between the VR Director and all other VR staff. As a result of increased communication between senior management and field staff, and as a result of staff feedback, SCCB implemented salary increases for VR Counselors and VR Assistants in order to improve retention and reduce turnover in these critical positions in 2019. Through strong leadership and the assistance of all staff, the Commission provides a healthy and safe work environment. Employee behavior and performance problems are addressed appropriately and in a timely manner, with an emphasis on assisting the employee to improve. SCCB promotes internal and external customer service and has made teamwork an integral part of day-to-day operations. SCCB provides career advancement and growth opportunities through internal promotions and staff training.

### 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and SCCB utilizes state standards to administer the Comprehensive System of Personnel Development (CSPD) as it relates to hiring practices. According to state law, VR Counselors must have a master's degree in Rehabilitation Counseling, or a master's degree in the field of counseling with a graduate course in Theories and Techniques of Counseling, or a master's degree in any discipline and at least 18 credit hours of coursework at the master's level or above within thirty months of the date of hire. The 18 credit hours of coursework must include the following: One graduate course with a primary focus on the Theories and Techniques of Counseling three graduate courses, each with a primary focus on one of the following areas: Occupational Information, Job Development and Placement, Medical Aspects of Disabilities, Foundations of Rehabilitation, Psychological Aspects of Disabilities, and Personal and Vocational Adjustment Two graduate courses, each with a primary focus on one of the following areas: Assessment, Research Methodology, Vocational and Career Development, Community Resources, Case Management, and Delivery of Rehabilitation Services; or a current Certified Rehabilitation Counselor (CRC) certification, regardless of degree.

SCCB currently has 0 vacant VR Counselor positions and 0 vacant Transition Counselor position that are in various stages of the recruitment process. Of the counselors currently employed by SCCB all meet the state minimum standard.

B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

SCCB conducts in-service trainings for professional staff throughout the fiscal year. These trainings are planned based on a yearly assessment of training needs that includes recent and emerging trends in Vocational Rehabilitation Counseling, current research findings, best practices, and quality assurance activities. SCCB works to encourage and support professional

staff in developing professional development plans that may include specific professional conferences, workshops, and on-line training.

#### 4. Staff Development

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

SCCB has developed a comprehensive staff development training program designed to expand and strengthen the knowledge and skill level of service delivery staff. During FFY 2018 SCCB has added a new VR Counselor Trainer position with the intent to provide more in-depth focused VR Counselor skill development. The four objectives outlined in the training program are based on the need to increase staff competency so that the quality and quantity of competitive employment placements can be improved. SCCB has partnered with the University of South Carolina and private and public consultants specializing in the field of vocational rehabilitation and/or blindness in order to provide quality staff development training. The most critical training needs of SCCB staff were determined from the results of a Staff Development Training Needs Assessment, comments from Training Evaluations, and the VR Staff Survey results from Comprehensive Statewide Needs Assessment. Staff development training needs have been identified in the areas of Leadership Skills, Administrative Skills and Technical Skills.

Four (4) training objectives were identified as follows:

- **Objective 1 (Leadership Training Objective)** Organization assessment, problem solving skills, basic supervisory skills and best personnel practices are the primary focus areas of Objective 1. To accomplish the leadership training objective, SCCB utilizes Certified Public Management (CPM) training, State sponsored supervisory training, National Rehabilitation Leadership Institute (NRLI) and other targeted trainings and conference to keep our business practices up to date with current paradigms. SCCB recognizes that staff development needs may change.
- **Objective 2 (Technical Skills Training)** The development of technical skills to achieve the SCCB mission and vision is the primary focus of Objective 2. Private contractors who specialize in the field of blindness and vocational rehabilitation are utilized to accomplish Objective 2. Continued professional development and retention CRC credentials is encouraged and supported by SCCB.
- **Objective 3 (Communication of Policies and Procedures)** Orienting staff to the SCCB organizational structure and service delivery policies and procedures is the primary focus of Objective 3. In order to accomplish this, new staff will participate in an agency wide two-day Employee Orientation provided by HR. They will also receive field specific training in AWARE, VR training modules on policy and procedures, and shadow adjustment and VR staff for a two-week period.
- **Objective 4 (Specialty Training)** For FY 2020, each region is scheduled for quarterly meetings in which case staffing and regional specific trainings will be included. Departmental training schedules are currently being developed with the intention of holding one annual in-service when feasible. Bi-annual surveys of staff are done to stay abreast of trends in staff training needs. In an effort to provide equal access to staff

development training for all staff, accessible formats (i.e. Braille, large print, electronic format, etc.) will be provided to those who require alternative formats.

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

SCCB has partnered with the University of South Carolina and private and public consultants specializing in the field of vocational rehabilitation and/or blindness in order to provide quality staff development training. SCCB is also working closely with WINTAC to ensure provision of best practices. SCCB also utilizes trainings through The National Research and Training Center for Blind and Visually Impaired at Mississippi State University and Hadley Institute for specialized training in serving consumers who are Blind and visually impaired.

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

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

SCCB strives to have qualified staff proficient in Braille production, in communication with the Deaf/Blind, and a bilingual counselor to communicate with the rapidly growing Hispanic population. SCCB engages in ongoing efforts to study demographic trends and changes to the population to identify areas of needed expertise. Braille services are provided to SCCB staff and upon request to other public and/or private entities statewide. SCCB has a Deaf/Blind Consultant who is proficient in the use of sign language for the deaf, hard of hearing and dual sensory impaired. SCCB contracts interpreter services as needed in order to serve all other individuals who have limited English speaking ability or limited modes of communication.

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

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

SCCB is improving collaboration with the South Carolina Department of Education (SCDOE) to coordinate procedures and activities under the Individuals with Disabilities Education Act (IDEA). The focus of the collaboration has been the development of strategies for improving service delivery systems for blind and visually impaired individuals who are receiving services from the SCCB Children's Services program and VR Transition Counselors. SCCB has become a fully engaged and active partner in the Transition Alliance of South Carolina (TASC) that includes regional coordinating councils where the partner agencies receive training, develop collaborative plans, and develop professional relationships. TASC is a partnership of the Department of Education, Department of Disability and Special Needs, Vocational Rehabilitation Department, and SCCB.

**j. Statewide Assessment**

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

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

SCCB contracted with the National Center for Innovation, Training and Excellence (NCITE), a part of San Diego State University Research Foundation's Interwork Institute (SDSURF-II) during FFY 2019 to conduct a Comprehensive Statewide Needs Assessment to determine the vocational

rehabilitation needs of South Carolinians who are blind or visually impaired, identify the areas of VR program operations where service gaps exist, and identify areas of program innovation and improvement to become fully compliant with requirements of the Workforce Innovation and Opportunities Act.

According to the SCCB 2019 Comprehensive Statewide Needs Assessment, transportation was sighted as a significant need and barrier to employment for the blind and visually impaired population in South Carolina. SCCB provides transportation in conjunction with other VR services to allow SCCB consumers to participate in rehabilitation services and employs 3 fulltime and 5-part time drivers to transport consumers to and from the Ellen Beach Mack Rehabilitation Center located centrally in the city of Columbia and to low vision clinics across the state. None the less, consumers struggle to maintain employment post exit given the costliness, unreliability, and inefficiency of transportation, especially in the most rural regions of the state. SCCB is currently developing contracts with transportation providers to address this barrier to employment.

Assistive technology training, Independent Living Skills training, and Self-advocacy training issues were identified as additional rehabilitation needs and result from the rehab center's limited 36 bed housing capacity. SCCB is developing contractual agreements, when possible, with community rehab providers across the state to increase training capacity. Challenges include high training costs, lack of qualified staff, and reduction in training quality and frequency as observed by SCCB staff. SCCB Director of Consumer Services is working closely with the Training & Employment division to streamline our in-house Assistive Technology curriculum to reduce training times while maintaining training quality and relevance. SCCB has implemented a plan to eliminate silos, create seamless access to all services, unify multiple waitlists for services, and create a combined schedule that allows consumers to participate in courses from both departments simultaneously. Director of Consumer Services is working with Rehab Center staff to create a Job Readiness course to address soft skills needs, self-advocacy deficiencies, and lack of understanding of career pathways and local labor markets.

In addition, transportation challenges require that SCCB transport consumers to and from the rehab center on a weekly basis as the dormitory is not open on weekends. SCCB is researching the possibility of contracting with transportation providers to increase transportation capacity and serve more consumers.

Fear of loss of Social Security benefits was cited as a barrier to employment. SCCB is actively providing staff training through partnership with the E3 Grant project to ensure that staff understand that consumers can work and still receive SS benefits. SCCB employs a Benefits Specialist to provide consultation to all interested consumers to explore the effect of employment on SS benefits.

Supported Employment is a significant rehab need and is provided by 3 SCCB Jobs Oriented Blind Specialists who provide Customized employment and Supported Employment services. The JOB Specialists continue to work with Griffin and Hammis Associates to enhance delivery of Customized Employment services. SCCB participates on the SC Disability Employment-infrastructure Committee (SCDEC) along with SC Centers for Independent Living, SC Vocational Rehabilitation, SC Department of Disability and Special Needs (DDSN), and Protection and Advocacy for People with Disabilities. The SCDEC is collaborating on a resource mapping project to identify service gaps and increase co-enrollment across programs in order to maximize access to services and promote the blending and braiding of funds.

**B. Who are minorities;**

There were no ethnic groups or disability types identified as potentially underserved by SCCB with any consistency. Hispanic and Asian individuals with blindness and visual impairments were the two ethnic groups that were cited as potentially underserved, but this was infrequent.

**C. Who have been unserved or underserved by the VR program;**

The rural population in SC is potentially underserved by SCCB. SCCB is partnering with the E3 Grant Project to conduct outreach to eye medical providers in an effort to generate VR program referrals and address the needs of this underserved population. SCCB's Low Vision Clinic staff, VR Counselors, and Training & Employment staff work closely with schools, employers, and Ophthalmologists to identify individuals who may need SCCB services.

SCCB employs a Deafblind Coordinator certified in ASL who serves the Deafblind population throughout the state. The Deafblind Coordinator conducts extensive outreach and education activities in partnership with the SC Deafblind Project and the SC Association for the Deaf (SCAD).

SCCB employs a Certified Vision Rehabilitation Therapist (CVRT) who translates material into Braille to insure access. SCCB also purchases language interpreter services as needed via purchase authorization.

**D. Who have been served through other components of the statewide workforce development system; and**

- The SC Works Centers in South Carolina are not effectively meeting the service needs of individuals with blindness and visual impairments throughout the State, however, we are continuing to make improvements in this area. SCCB Regional Directors and VR Counselors actively participate in Workforce events. SCCB looks forward to implementation of "system fairs" in which employers can learn about all partner services. SCCB Training & Employment Division staff provide consultation and technical assistance to ensure that all SC Works locations are equipped with adequate assistive technology. SCCB consumers often express that they feel uncomfortable seeking services from SC Works, but VR Counselors continue to provide Counseling and Guidance to address consumer fears and anxiety. VR Counselors and Employment Consultants provide the majority of support to consumers in areas of job search and completing job applications even when consumers are co-enrolled at SC Works and this leads to staff frustration. SCCB staff continue to provide services at SC Works locations in accordance with Infrastructure Funding Agreements and cost sharing principals.
- The relationship between SCCB and the SC Works Centers remains primarily one of referral with little follow up from the SC Works staff or the consumer. VR Counselors are encouraged to meet consumers at the SC Works location. SCCB is exploring the possibility of providing more intensive Orientation and Mobility support at SC Works locations to counteract the negative impact of anxiety on participation. Consumers often lack transportation to SC Works locations, and this leads to disengagement.
- There is a need to effectively track and report co-enrollment of SCCB and other core partner consumers, however SCCB has reached out to several SC Works locations to include SCCB as a partner agency on the registration consoles used by consumers to sign in and out of SC Works locations. These requests were made in response to the 2019 CSNA and SCCB is hopeful that the requests will be honored by SC Works Operators in the coming months.
- The SC Works Centers need to improve programmatic accessibility and are working closely with SCCB VR Counselors and Training & Employment staff to accomplish this.

SCCB willingly partners with agencies to create accessible materials in Braille and SCCB staff will continue to provide intensive support to our consumers to allow them to access SC Works programs and services.

**E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.**

SCCB is delivering all 5 Pre-employment Transition Services either through SCCB staff or contractual agreements with SC Centers for Independent Living and Successful Transitions NFB. The number of students receiving Pre-ETS services continues to increase. VR Counselors work closely with SCCB Children's program staff to identify students with disabilities who are aging out of the children's program and are interested in receiving VR services. SCCB has recently revised the Pre-ETS policy to align age criteria with SCVR, the agency serving all other disabilities in South Carolina. In response to the 2019 CSNA, SCCB recently delivered comprehensive Pre-ETS training to improve tracking and reporting of Pre-ETS expenditures. The training defined the 5 Pre-ETS services, outlined eligibility criteria, and informed staff regarding documentation requirements. VR Counselors are working closely with Teachers for the Visually Impaired (TVIs) to provide Pre-ETS services statewide. Students participate in work-based learning consisting of job shadowing, internships, and workplace tours through the Summer Teen program. SCCB has decided to outsource the 2020 Summer Teen program for the first time. Students will receive intensive technology training, attend self-advocacy workshops, and engage in work experiences. Outsourcing of the Summer Teen will allow SCCB to continuously serve our adult population and avoid lengthy waitlists due to the Summer Teen program.

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

SCCB realizes the need to provide rehabilitation services in consumers' local communities. For this reason, SCCB is working with the SC Materials Management Office and SC Department of Administration to develop contracts in order to begin the procurement process for these services. SCCB is currently working on scopes of work and draft agreements in the areas of Orientation and Mobility, Assistive Technology Training, and Job Placement services. SCCB understands that not all consumers can travel to our rehabilitation center in Columbia for services and is working to develop services in local communities to meet consumer needs.

**3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act**

SCCB contracted with the National Center for Innovation, Training and Excellence (NCITE), a part of San Diego State University Research Foundation's Interwork Institute (SDSURF-II) during FFY 2019 to conduct a Comprehensive Statewide Needs Assessment to determine the vocational rehabilitation needs of South Carolinians who are blind or visually impaired, identify the areas of VR program operations where service gaps exist, and identify areas of program innovation and improvement to become fully compliant with requirements of the Workforce Innovation and Opportunities Act. This assessment was designed to specifically assess the areas noted under section (j) above.

SCCB Transition VR Counselors participate in Transition Planning in conjunction with school district staff. Transition VRCs explore career pathways and job requirements through the Career Index in multiple counseling and guidance sessions with the consumer and the consumer's parents as appropriate. Transition planning often occurs at IEP meetings and through college exploration sessions. Transition VRCs consider the student's IEP in developing the Individualized Plan for Employment to ensure no duplication of services. Transition VRCs assist students in preparing for college by facilitating services

from an early age. Training consists of Orientation and Mobility, Braille, and Assistive Technology and allows students to participate on an equal footing with sighted counterparts in transitioning from school to work. Emphasis is placed on blind students acquiring the ability to use screen reading software and type effectively to complete assignments.

Transition VRCs review SCCB tuition assistance guidelines and explain the necessity of applying for federal financial aid as a comparable benefit. Transition VRCs also accompany students on college tours and assist with summer internships to prepare students for employment. SCCB assists TVIs with regard to necessary accommodations and act as advocates for the student in the Transition Planning process.

## ***k. Annual Estimates***

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Describe:

### **1. The number of individuals in the State who are eligible for services**

Based on data obtained from the 2017 American Community Survey (ACS) and Cornell University's Annual Disability Status Report for South Carolina, results estimate that 43.6% percent of South Carolinians experience a visual impairment or blindness. (ACS criteria for visual impairments is broader than VR program eligibility) The most recent American Community Survey data indicates that there are an estimated 4,304 South Carolinians who have some level of visual impairment who are working age (21 to 64) and who are not currently working but are actively seeking employment. In addition to the ACS estimates there are 3,477 youth (age 16-20) who have visual impairments in the state. This is a total estimate of 7,781 individuals who have visual impairments between the ages of 16 and 64.

The visual impairment categorization in the ACS is very broad, all-inclusive, and self-reported. In estimating the number of individuals who would meet the narrower VR program eligibility criteria, SCCB estimates that in any given federal fiscal year there are approximately **3,035 potentially eligible individuals** within the state.

Of those SCCB is currently serving **1,114 eligible individuals**. SCCB continues to engage in outreach efforts and strategies that strive to increase accessibility and awareness of the VR program so that potentially eligible individuals are aware of and can access VR services. In addition, SCCB is working with WIOA core partners to ensure that blind and visually impaired individuals seeking employment can access services through the one-stop American Job Centers as part of the Statewide Workforce Development System.

### **2. The number of eligible individuals who will receive services under:**

#### **A. The VR Program;**

**SCCB Response:** SCCB estimates that the VR program will serve **1,200** during FFY 2020, and **1,230** during FFY 2021.

#### **B. The Supported Employment Program; and**

SCCB built the capacity to provide Supported Employment services in FFY 2017. SCCB is currently providing Supported Employment services to eight individuals. SCCB has established goals to provide Supported Employment services to ten individuals during FFY 2020, and ten individuals during FFY 2021.

#### **C. Each priority category, if under an order of selection.**

SCCB does not anticipate the need for an order of selection.

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

SCCB does not anticipate the need for an order of selection.

4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

# OF INDIVIDUALS FY 2020 (ESTIMATED)	TOTAL ESTIMATED COST TO SERVE	# OF INDIVIDUALS FY 2021 (ESTIMATED)	TOTAL ESTIMATED COST TO SERVE
1,101	2,256,577	1,133	2,234,274

## I. State Goals and Priorities

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The designated State unit must:

1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions

The findings of the FFY 2016 Comprehensive Statewide Needs Assessment were used to develop goals, priorities, and strategies reflected in the previous iteration of the South Carolina Unified State Plan. See section (p.) *Evaluation and Reports of Progress* for information related to progress on the previous state plan goals and priorities.

For the current WIOA State Plan, SCCB identified gaps from two primary sources. The first being unmet gaps identified in the FFY 2019 Comprehensive Statewide Needs Assessment. The second source is the South Carolina Workforce Development Board's Economic Analysis and Strategic Plan. The following gaps have been identified:

**Gap 1:** South Carolina's current labor force, including individuals who are blind or visually impaired, do not have industry recognized credentials, knowledge, skills, or abilities to meet current or emerging demands of the business community.

**Gap 2:** SCCB needs to improve alignment of policies, resources, and staff expertise to provide job driven, labor market informed, vocational counseling and guidance that aligns with South Carolina's Talent Pipeline Project and Sector Strategies initiatives to assist eligible consumers in accessing career pathways that lead to high and middle skill/income jobs in growth sectors.

**Gap 3:** SCCB needs to improve partnerships with business in order to more accurately identify current and future workforce needs of business and industry to support career pathways in growth sectors and improve services to business.

**Gap 4:** SCCB needs to improve marketing, branding, and engagement with business, consumers, and other workforce partners to increase awareness, improve partnerships, and increase effectiveness and efficiency of services leading to competitive integrated employment.

## 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs

Based on these identified gaps, and in alignment with the South Carolina Workforce Development Board's Strategic Plan, SCCB establishes the following objectives. These objectives have been jointly developed and agreed to by the South Carolina Commission for the Blind Board and are in alignment with the Workforce Development Board's Strategies to Build a Competitive Workforce Plan.

**Objective 1:** Increase participation in work-based learning activities, including registered apprenticeships.

**Objective 2:** Align resources, policies, and strategies between state, local, and regional systems to continuously improve outcomes for businesses, partners

**Objective 3:** Identify current and future workforce needs of South Carolina business and industry to support career pathways in growth sectors.

**Objective 4:** Engage job seekers, business leaders, and other workforce partners through marketing and outreach to articulate a value proposition to each.

See section (o) below for SCCB's goals and strategies to meet these objectives.

### 3. Ensure that the goals and priorities are based on an analysis of the following areas:

#### A. The most recent comprehensive statewide assessment, including any updates;

SCCB contracted with the National Center for Innovation, Training and Excellence (NCITE), a part of San Diego State University Research Foundation's Interwork Institute (SDSURF-II) during FFY 2019 to conduct a Comprehensive Statewide Needs Assessment to determine the vocational rehabilitation needs of South Carolinians who are blind or visually impaired, identify the areas of VR program operations where service gaps exist, and identify areas of program innovation and improvement to become fully compliant with requirements of the Workforce Innovation and Opportunities Act. The text of that report follows:

SCCB has utilized the findings of this CSNA report to identify challenges and priorities for the Agency. The Senior Leadership Team is working together to develop a new strategic plan for the full agency based on identified challenges in the CSNA. SCCB goals and priorities included in this state plan were developed by the SCCB Vocational Rehabilitation Team to specifically address staff training needs, community partnerships, business relationships, and concerns identified by consumers around benefits counseling and assistive technology services. SCCB also utilized feedback from the CSNA to strengthen our services in the areas of Pre-employment transition services and Supported Employment.

The South Carolina Commission for the Blind (SCCB), the Board of Commissioners and the Interwork Institute at San Diego District University jointly conducted an assessment of the Vocational Rehabilitation needs of persons with blindness and visual impairments residing in the State of South Carolina. A triennial needs assessment is required by the Rehabilitation Act of 1973 as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA) and is intended to help inform the Unified State Plan developed by the core partners in South Carolina's Workforce Development System. The data was gathered, analyzed, and grouped into the sections listed below. A summary of key findings in each section is contained here. The full results are found in the body of the report.

**Please Note:** The summary of findings here and throughout the report primarily identify the rehabilitation needs of individuals with blindness and visual impairments in South Carolina. When a need is identified, it is not intended to imply that the need is not being met by SCCB or other service providers unless explicitly stated.

#### *Section One: Overall performance of SCCB*

Recurring themes in this area include the following:

- SCCB staff are characterized as committed and caring individuals that strive to do their best for consumers;
- Staff turnover was presented by the different groups as a challenge for SCCB that has an effect on service delivery speed and the continuity of partner relationships. Staff turnover is a common challenge faced by VR agencies across the country;

- SCCB needs to more effectively market their services to the community and increase public awareness of the organization; and
- Staff training is an essential need that is compounded by turnover.

***Section Two: The needs of individuals with the most significant disabilities, including their need for supported employment***

Recurring themes in this area include the following:

- Transportation was cited most frequently as a significant need of consumers served by SCCB, and this is especially true in rural areas. The lack of available public transportation for individuals with disabilities, including individuals with blindness and visual impairments, is often cited as a significant barrier to employment. This is especially true in rural areas of each State where there are very limited public transportation options;
- Assistive technology (AT), independent living skills and self-advocacy skills training were cited as significant needs of individuals with blindness and visual impairments by those interviewed and surveyed for this assessment;
- The fear of the loss of SSA benefits affects the return-to-work behavior of individuals with blindness and visual impairments in South Carolina. This is a common and well documented concern of SSA beneficiaries across the nation; and
- Supported employment (SE) is a significant need of individuals served by SCCB, but the service is very limited due to a lack of staff and provider knowledge of SE and a lack of training to address this service gap.

***Section Three: The needs of individuals with blindness or visual impairments from different ethnic groups, including needs of individuals who have been unserved or underserved by the VR program***

Recurring themes in this area include the following:

- There were no ethnic groups or disability types identified as potentially underserved by SCCB with any consistency. Hispanic and Asian individuals with blindness and visual impairments were the two ethnic groups that were cited as potentially underserved, but this was infrequent.
- The rural areas of the State were cited most frequently as potentially underserved by the participants in this assessment;
- The lack of transportation in rural areas and the distance that staff needed to travel to reach potential consumers were the most frequently cited reasons for the areas being potentially underserved;
- Individuals that are Deaf-Blind were cited as being potentially underserved; and
- The needs of potentially underserved groups did not vary from the general population of individuals with blindness and visual impairments served by SCCB, with the exception of the need for language interpreters.

***Section Four: The needs of youth and students with blindness or visual impairments in transition***

Recurring themes in this area include the following:

- All of the five required pre-employment transition services (Pre-ETS) represent significant rehabilitation needs of students with blindness and visual impairments in South Carolina, with work-based learning experiences being the most significant and important need. The tracking and reporting of Pre-ETS is an area in need of development for SCCB;
- Transportation, self-advocacy, work experience, job training and AT are needs of youth with blindness and visual impairments in South Carolina; and
- Soft skills training was cited repeatedly as a need for youth in transition.

***Section Five: The needs of individuals with blindness or visual impairments served through other components of the statewide Workforce Development System***  
Recurring themes in this area include the following:

- The SC Works Centers in South Carolina are not effectively meeting the service needs of individuals with blindness and visual impairments throughout the State;
- The relationship between SCCB and the SC Works Centers remains primarily one of referral;
- There is a need to effectively track and report co-enrollment of SCCB and other core partner consumers; and
- The SC Works Centers need to improve programmatic accessibility.

***Section Six: The need to establish, develop or improve Community Rehabilitation Programs in South Carolina***

Recurring themes in this area include the following:

- There is a need to develop supported employment providers that are experienced in working with individuals with blindness and vision impairments;
- Interview and survey participants indicated that there is a need for more providers in the rural areas of South Carolina; and
- Interview participants indicated that there is a need for more employment services providers in the State.

***Section Seven: The needs of businesses***

This category captures the needs of businesses in South Carolina as it relates to recruiting, hiring, retaining and accommodating individuals with blindness or visual impairments. It includes an analysis of how SCCB serves business and tries to meet their needs in each of these areas.

Recurring themes in this area include the following:

- Employer bias and misconceptions about hiring individuals with blindness and visual impairments is a key barrier to SCCB consumers obtaining employment;
- Employers need more education and awareness regarding individuals with blindness and vision impairments and the supports available to employers; and
- There is a strong need to market SCCB to the business community.

The project team provides recommendations associated with some of the needs identified in each of the categories. It is understood that many of the recommendations

require the collaboration and partnership of multiple agencies over an extended period of time. Some of the recommendations may be much easier to adopt and implement than others. The project team offers the recommendations with this awareness and hopes that SCCB and other stakeholders will find these recommendations helpful.

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

The findings of the FFY 2016 Comprehensive Statewide Needs Assessment were used to develop goals, priorities, and strategies reflected in the previous iteration of the South Carolina Unified State Plan. See section (p.) *Evaluation and Reports of Progress* for information related to progress on the previous state plan goals and priorities.

SCCB has developed a BRIDGE program that assists consumers in gaining specific credentials and/or skills through on the job internships. SCCB is also developing training opportunities with employers across the state that will result in certifications that will lead to employment. The training and internship programs directly relate to WIOA performance measures because a well trained employee will have higher wages, longer job retention, credential attainment, and measurable skill gains as they progress through training.

For the current WIOA State Plan, SCCB identified gaps from two primary sources. The first being unmet gaps identified in the FFY 2019 Comprehensive Statewide Needs Assessment. The second source is the South Carolina Workforce Development Board's Economic Analysis and Strategic Plan. The following gaps have been identified:

**Gap 1:** South Carolina's current labor force, including individuals who are blind or visually impaired, do not have industry recognized credentials, knowledge, skills, or abilities to meet current or emerging demands of the business community.

**Gap 2:** SCCB needs to improve alignment of policies, resources, and staff expertise to provide job driven, labor market informed, vocational counseling and guidance that aligns with South Carolina's Talent Pipeline Project and Sector Strategies initiatives to assist eligible consumers in accessing career pathways that lead to high and middle skill/income jobs in growth sectors.

**Gap 3:** SCCB needs to improve partnerships with business in order to more accurately identify current and future workforce needs of business and industry to support career pathways in growth sectors and improve services to business.

**Gap 4:** SCCB needs to improve marketing, branding, and engagement with business, consumers, and other workforce partners to increase awareness, improve partnerships, and increase effectiveness and efficiency of services leading to competitive integrated employment.

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

SC does not have a State Rehabilitation Council and no monitoring activities were conducted.

**m. Order of Selection**

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Describe:

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

**A. The order to be followed in selecting eligible individuals to be provided VR services**  
SCCB tracks resources on a continual ongoing basis and has determined that the agency currently has the staff and financial resources to provide required and effective VR services to all eligible individuals in the state and does not anticipate implementing an Order of Selection.

**B. The justification for the order**

SCCB tracks resources on a continual ongoing basis and has determined that the agency currently has the staff and financial resources to provide required and effective VR services to all eligible individuals in the state and does not anticipate implementing an Order of Selection.

**C. The service and outcome goals**

SCCB tracks resources on a continual ongoing basis and has determined that the agency currently has the staff and financial resources to provide required and effective VR services to all eligible individuals in the state and does not anticipate implementing an Order of Selection.

**D. Time within which these goals may be achieved for individuals in each priority category within the order; and**

SCCB tracks resources on a continual ongoing basis and has determined that the agency currently has the staff and financial resources to provide required and effective VR services to all eligible individuals in the state and does not anticipate implementing an Order of Selection.

**E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities**

SCCB tracks resources on a continual ongoing basis and has determined that the agency currently has the staff and financial resources to provide required and effective VR services to all eligible individuals in the state and does not anticipate implementing an Order of Selection.

**2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment**

SCCB tracks resources on a continual ongoing basis and has determined that the agency currently has the staff and financial resources to provide required and effective VR services to all eligible individuals in the state and does not anticipate implementing an Order of Selection.

***n. Goals and Plans for Distribution of title VI Funds***

**1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services**

The South Carolina Commission for the Blind has established the capacities to provide Supported Employment to youth and adults with Most Significant Disabilities. Funds received under section 603 of the Rehabilitation Act for Supported Employment are utilized to fund the costs of on-the-job supports for Supported Employment and Customized Employment delivered internally by JOBS Specialists. SCCB provides extended services for a period not to exceed 4 years. Supported Employment services cannot be provided to any consumer past the age of 25.

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

**A. The provision of extended services for a period not to exceed 4 years; and**

The South Carolina Commission for the Blind has established the capacities to provide Supported Employment to youth and adults with Most Significant Disabilities. Funds received

under section 603 of the Rehabilitation Act for Supported Employment are utilized to fund the costs of on-the-job supports for Supported Employment and Customized Employment delivered internally by JOBS Specialists for youth with the most significant disabilities. SCCB provides extended services for a period not to exceed 4 years and cannot provide services beyond a consumer's 25th birthday.

**B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.**

SCCB has signed a Partnership Plus Agreement under the Ticket to Work program to provide long term on going supports through an Employment Network (Able SC). SCCB utilizes 50 percent of Supported Employment funds to provide Supported Employment and Customized Employment for eligible youth. SCCB has established goals to provide Supported Employment services to six eligible individuals during FFY 2018 and has provided supported employment services to six consumers in FFY 2019. SCCB predicts serving 10 individuals during FFY 2020, and 10 individuals during FFY 2021. SCCB is currently in the process of developing external agreements to provide Supported Employment services.

**o. State's Strategies**

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Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

**1. The methods to be used to expand and improve services to individuals with disabilities**  
The findings of the FFY 2016 Comprehensive Statewide Needs Assessment were used to develop goals, priorities, and strategies reflected in the previous iteration of the South Carolina Unified State Plan. See section (p.) Evaluation and Reports of Progress for information related to progress on the previous state plan goals and priorities.

For the current Combined State Plan, SCCB identified gaps from two primary sources. The first being unmet gaps identified in the FFY 2019 Comprehensive Statewide Needs Assessment. The second source is the South Carolina Workforce Development Board's Economic Analysis and Strategic Plan. The following gaps have been identified:

**Gap 1:** South Carolina's current labor force, including individuals who are blind or visually impaired, do not have industry recognized credentials, knowledge, skills, or abilities to meet current or emerging demands of the business community.

**Gap 2:** SCCB needs to improve alignment of policies, resources, and staff expertise to provide job driven, labor market informed, vocational counseling and guidance that aligns with South Carolina's Talent Pipeline Project and Sector Strategies initiatives to assist eligible consumers in accessing career pathways that lead to high and middle skill/income jobs in growth sectors.

**Gap 3:** SCCB needs to improve partnerships with business in order to more accurately identify current and future workforce needs of business and industry to support career pathways in growth sectors and improve services to business.

**Gap 4:** SCCB needs to improve marketing, branding, and engagement with business, consumers, and other workforce partners to increase awareness, improve partnerships, and increase effectiveness and efficiency of services leading to competitive integrated employment.

Based on these identified gaps, and in alignment with the South Carolina Workforce Development Board's Strategic Plan, SCCB establishes the following objectives. These objectives have been jointly developed and agreed to by the South Carolina Commission for the Blind Board and are in alignment with the Workforce Development Board's Strategies to Build a Competitive Workforce Plan.

**Objective 1:** Identify, invest and support blind and visually impaired job seekers in the attainment of industry recognized credentials and vocational training required for current and emerging jobs.

**Goal 1.1:** Provide comprehensive vocational rehabilitation services to youth and transition students resulting in the attainment of industry recognized credentials to obtain competitive integrated employment.

**Strategy 1.1.1:** Provide Pre-Employment Transition Services (Pre-ETS) through the Career BOOST and Summer Teens Programs. In cooperation and collaboration with public schools these services include career exploration and counseling, self- advocacy skills training, work readiness training, work- based learning experiences, and exploration of post- secondary education and training.

**Key Performance Indicator 1.1.1:** Number Participants Completed

**Strategy 1.1.2:** Support the attainment of a High School Diploma, GED and/or SC Employability Credential through vocational counseling and guidance, assistive technology, coordination and collaboration with public schools.

**Key Performance Indicator 1.1.2:** Number Participants Completed

**Strategy 1.1.3:** Invest in, facilitate and support completion of Post-Secondary college and university vocational training.

**Key Performance Indicator 1.1.3:** Number Participants Completed

**Goal 1.2:** Provide comprehensive vocational rehabilitation services to job seekers who are blind or visually impaired resulting in the attainment of industry recognized credentials required for competitive integrated employment.

**Strategy 1.2.1:** Provide quality Adjustment to Blindness and Pre-Vocational Training at the Ellen Beach Mack Rehabilitation Center for Employment & Independence. Adjustment to Blindness Training includes: Orientation & Mobility (Independent Travel), Independent Living Skills, Braille Literacy, Employability Soft Skills, Basic Financial Literacy, and Psychosocial Adjustment to Blindness Counseling. Pre- Vocational Training includes: Basic Keyboarding, Basic Microsoft Office Suite Training, and Assistive Technology Training such as Computer Screen Readers, Text Magnifiers, Low Vision Aids, Etc.

**Key Performance Indicator 1.2.1:** Number Participants Completed

**Strategy 1.2.2:** Support the attainment of a High School Diploma, GED, and SC Employability Credential through vocational counseling and guidance, assistive technology, collaboration and technical assistance to adult education programs.

**Key Performance Indicator 1.2.2:** Number Participants Completed

**Strategy 1.2.3:** Invest in and support the completion of Post-Secondary vocational training through career exploration, vocational counseling and guidance, assistive technology, tuition assistance, collaboration and technical assistance to colleges and universities.

**Key Performance Indicator 1.2.3:** Number Participants Completed

**Objective 2:** Align resources, policy, and strategies to continuously improve competitive integrated employment outcomes for blind and visually impaired job seekers.

**Goal 2.1:** Develop and enhance job seeker work readiness and soft skills.

**Strategy 2.1.1:** Provide Adjustment to Blindness and Pre-Vocational Training at the *Ellen Beach Mack Rehabilitation Center for Employment & Independence*. Adjustment to Blindness Training includes: Orientation & Mobility (Independent Travel), Independent Living Skills, Braille Literacy, Employability Soft Skills, Basic Financial Literacy, and Psychosocial Adjustment to Blindness Counseling. Pre- Vocational Training includes: Basic Keyboarding, Basic Microsoft Suite Training, and Assistive Technology Training such as Computer Screen Readers, Text Magnifiers, Etc.

**Key Performance Indicator 2.1.1:** Number Participants Completed

**Strategy 2.1.2:** Facilitate the BRIDGE Program Job Club (Building Readiness for Individualized Development of Gainful Employment) provides consumers who have completed the Adjustment to Blindness and Pre-Vocational Training at the *Ellen Beach Mack Rehabilitation Center for Employment and Independence* a paid work-based learning experience (internship) and job club activities to enhance employability and jump start job placement in their local community.

**Key Performance Indicator 2.1.2:** Number Participants Completed

**Strategy 2.1.3:** Summer Internship Program (SIP) provides college and university students with a paid summer internship in their field of study during their Sophomore, Junior and Senior year.

**Key Performance Indicator 2.1.3:** Number SIP Graduates

**Goal 2.2:** Enhance and improve job placement services and job support services for job seekers who are blind or visually impaired.

**Strategy 2.2.1:** Increase job placement by Employment Consultants through talent acquisition services to business partners matching qualified job seekers who are blind or visually impaired with current job openings.

**Key Performance Indicator 2.2.1:** Number Successfully Employed

**Strategy 2.2.2:** Provide Supported Employment (SE) utilizing the initial placement and job coaching provided on a short-term basis by an SCCB JOBS Specialist (Job Oriented Blind Service) with long term extended supports provided by another agency such as an employment network, state agency, or natural supports.

**Key Performance Indicator 2.2.2:** Number Successfully Employed

**Strategy 2.2.3:** Provide Customized Employment that includes intensive discovery of individualized skills, abilities, potential; and intensive customization of an existing job opening, creation of a job that fills an unmet need, and other customized options. SCCB provides Customized Employment through a qualified and trained JOBS Specialist (Job Oriented Blind Service).

**Key Performance Indicator 2.2.3:** Number Successfully Employed

**Objective 3:** Identify current and future needs of business and industry to support career pathways in growth sectors.

**Goal 3.1:** Increase agency utilization of Labor Market Information and business relationships to inform career exploration, vocational goal setting, service provision, and job placement.

**Strategy 3.1.1:** Align career counseling, career exploration, and vocational goal planning with labor market information through the use of **The Career Index +**.

**Key Performance Indicator 3.1.1:** TCI+ Usage Report

**Strategy 3.1.2:** Employment Consultant engagement with business organizations including Chambers of Commerce, Society of Human Resource Management, and business relationship building.

**Key Performance Indicator 3.1.2:** Number Business Partnerships

**Strategy 3.1.3:** Engage and collaborate with WIOA core partner's business service coordination council to collaborate and coordinate business service efforts to include the blind and visually impaired labor market.

**Key Performance Indicator 3.1.3:** Number Business Partnerships

**Goal 3.2:** Increase and improve talent acquisition and talent retention services to business in support of employees who are blind or visually impaired.

**Strategy 3.2.1:** Provide Workplace Sensitivity Training Workshops and Accessibility Technical Assistance (TA) to business partners in order to facilitate the employment of people who are blind or visually impaired.

**Key Performance Indicator 3.2.1:** Number of Workshops/TA Services

**Strategy 3.2.2:** Provide Talent Acquisition Services to business partners by matching current open positions with qualified applicants who are blind or visually impaired, providing technical assistance in regard to assistive technology and reasonable accommodations.

**Key Performance Indicator 3.2.2:** Number Job Placements

**Strategy 3.2.3:** Provide Talent Retention Services to business partners by providing technical assistance, support, and training necessary for the business to retain an employee who is blind or visually impaired.

**Key Performance Indicator 3.2.3:** Number Successful Job Retentions

**Objective 4:** Engage job seekers, business leaders, and other workforce partners through marketing and outreach to articulate a value proposition to each.

**Goal 4.1:** Improve **visibility and branding of SCCB** with job seekers who are blind or visually impaired, businesses seeking to diversify labor market talent pool, and other workforce partners to increase the awareness and effectiveness of SCCB services.

**Strategy 4.1.1:** Complete Rebranding & Promotional Materials.

**Key Performance Indicator 4.1.1:** Completed/Not Completed

**Strategy 4.1.2:** Attend and distribute branding materials at Community Health Fairs, Career and Job Fairs, and other Community Resource Education Events.

**Key Performance Indicator 4.1.2:** Number Attended by SCCB Staff

**Goal 4.2:** Improve the visibility of SCCB within the Workforce Development System.

**Strategy 4.2.1:** Enhance programmatic presence in SC Works American Job Centers through assigned liaison relationships with field staff, standardized colocation hours, infrastructure cost sharing, accessibility assessment technical assistance and implementation, and availability of program educational information.

**Key Performance Indicator 4.2.1:** Completed/Not Completed

**Strategy 4.2.2:** Enhance programmatic presence at South Carolina Workforce Development Board meetings to ensure that the needs of job seekers who are blind or visually impaired are represented.

**Key Performance Indicator 4.2.2:** Completed/Not Completed

**2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis**

SCCB's Employment and Training Division provides SCCB consumers with assistive technology assessments when necessary at each stage of the vocational rehabilitation process to ensure that eligible individuals have the tools and AT resources necessary to succeed in their Individualized Plan for Employment activities and services. VR Counselors make referrals to the T & E Division staff for assessments when the need is identified.

In addition, SCCB has a cooperative agreement with the South Carolina Assistive Technology Program at the University of South Carolina School of Medicine to access comparable benefits, eliminate duplication of services, and increase coordination of employment services provided to the shared consumer populations. SCCB will work to enhance and improve this partnership.

**3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program**

In order to identify and make VR services available to minorities, individuals with most significant disabilities, and those traditionally unserved or underserved by the VR program, SCCB has conducted outreach and information to South Carolina's Native American tribes, to community service organizations that serve the Hispanic community, and has established and enhanced our services to Deaf-Blind consumers. In addition, SCCB has engaged in staff training on how to effectively serve individuals with multiple significant disabilities. SCCB is working to improve the program's visibility, branding, and presence in the SC Works American Job Centers. During FPY 2018 SCCB is engaging in an E3 Targeted Communities Technical Assistance Grant focused on improving the capacity to serve individuals in rural-high poverty areas.

**4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services)**

**Career BOOST Pre-Employment Transition Services:** SCCB has implemented Career BOOST (Building Occupational Opportunities for Students in Transition). This program

augments SCCB's comprehensive transition services program by providing the five (5) required Pre Employment Transition Services (PETS) to eligible or potentially eligible students statewide in collaboration and coordination with public schools. These Pre-ETS services include: 1. Self-Advocacy Training 2. Work Readiness Workshops 3. Work-based Learning Experiences 4. Post-Secondary Education Enrollment and Careers Exploration 5. Information & Referral to SCCB's Transition VR Program.

**Student Internship Program Jr.:** SCCB has expanded our highly successful Student Internship Program (SIP) that provides paid summer internships for college seniors and juniors, by developing the SIP Jr. Program that provides paid summer internship opportunities in a variety of career fields to transition students in their senior and junior year of High School.

**Summer Teens Program:** SCCB will continue the very successful Summer Teens Program that brings students from across the state to engage in 5 weeks of career exploration, blindness skills that support employment training, self-advocacy training, paid work based learning experiences, and softskills work readiness training.

**Transition Alliance of South Carolina:** SCCB is an active partner on TASC where we collaborate and coordinate with other partner programs that serve transition aged students with disabilities. **Advisory Council for Educating Students with Disabilities:** SCCB serves on the ACESD to partner with the South Carolina Office of Special Education, public schools, parents, students, and other organizations with the goal to improve post-school outcomes and employment.

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

SCCB will continue to seek opportunities and partnerships to aid in the development and establishment of Community Rehabilitation Programs (CRP) to provide community based adjustment to blindness services, supported employment (SE) services, customized employment (CE) services and life skills training.

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

It is the position of SCCB that the Goals, Priorities, and Strategies listed in this state plan will lead to improvements on performance accountability measures after the initial "baseline" establishing year of FFY 2016.

SCCB has created new internship programs for consumers that provide opportunities to complete training in areas such as customer service and retail operations. This training is designed to provide measurable skill gains and in some cases a credential that can lead to higher paying employment opportunities. The rehabilitation center at SCCB has also created a new curriculum with an employment focus that will increase measurable skill gains. With programs in place that lead to careers instead of just survival jobs it is also expected that consumers will remain employed which will lead to higher rates for second and fourth quarter reporting as well. The implementation of JOBS specialists will increase the opportunities for serving the most significantly disabled in the area of supported employment.

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

SCCB has been an active partner in the WIOA Unified State Plan Implementation Team. South Carolina's plans are to continue convening this group of core WIOA partners to continue to develop meaningful and effective partnerships, share expertise and knowledge, skills, and abilities, and to expand the ability of the system to serve all individuals including those with disabilities. In addition, SCCB is working to

ensure that there is agency presence in the local one stop American Job Centers on a consistent basis to provide support and expertise to consumers who are blind or visually impaired. SCCB entered into MOU's and Infrastructure Cost Agreements with all SC Works service deliver areas. SCCB is continuously working with SC Works to provide assessment and technical assistance to ensure programmatic and physical accessibility.

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

**A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;**

The Goals, Priorities, and Strategies detailed in the SCCB VR program portion of the Unified State Plan were designed to directly address the gaps in service needs identified in the 2019 Comprehensive Statewide Needs Assessment and align with the state Workforce Investment Board's Strategic Plan. These Goals, Priorities, and Strategies form the basis of our 4-year Strategic Plan for the VR program at SCCB. The Senior Management Team meets on a monthly basis to review progress toward Strategic Plan goals.

**B. Support innovation and expansion activities; and**

The following strategies are newly developed, expanding, and/or innovative initiatives included in this state plan:

***Soft Skills Training to Support Employment Curriculum:*** In partnership with the core WIOA partners SCCB will participate in the review, selection, purchase and implementation of a state wide standardized curriculum on the "soft skills" that South Carolina Businesses have been requesting from the statewide Workforce Investment Board. **CRP Establishment & Development:** SCCB will continue to seek opportunities and partnerships to aid in the development and establishment of Community Rehabilitation Programs (CRP) to provide community based adjustment to blindness services, supported employment (SE) services, customized employment (CE) services, Braille training, vocational evaluation, and life skills training.

***Career BOOST Pre-Employment Transition Services:*** SCCB is utilizing Career BOOST (Building Occupational Opportunities for Students in Transition). This program augments SCCB's transition services program by providing the five (5) required Pre-Employment Transition Services (PETS) to eligible or potentially eligible students statewide. These PETS services will include: 1. Self-Advocacy Training 2. Work Readiness Workshops 3. Work-based Learning Experiences 4. Post-Secondary Education Enrollment and Careers Exploration 5. Information & Referral to SCCB's Transition VR Program ***Career Exploration Lab:*** SCCB established the "Career Exploration Lab" where transition students are exposed to career exploration in functional 3-D fabrication, manufacturing using 3-D printer technology, product development, business development, microenterprise development, entrepreneurship, marketing and other science, technology, engineering, and math careers.

**C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.**

SCCB is committed to ensuring that services are provided in an equitable manner and are fully accessible. SCCB reviews, assesses and monitors agency programs to conduct continuous improvement activities. The greatest gap identified in the 2016 Comprehensive Statewide Needs Assessment pertained to the lack of a Supported Employment program at SCCB. In response SCCB established the JOBS Specialists (Job Oriented Blind Services) positions trained

to provide Supported Employment (SE), Customized Employment (CE), and Individual Placement and Support (IPS) models to consumers who have Most Significant Disabilities. These positions function in a one-on-one consumer centered approach as Job Placement Specialists, On-The-Job Coaches, and in other employment related supportive roles allowed under Title VI.

### *p. Evaluation and Reports of Progress: VR and Supported Employment Goals*

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Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals

**Goal 1.1:** Provide comprehensive vocational rehabilitation services to youth and transition students resulting in the attainment of industry recognized credentials to obtain competitive integrated employment.

**Goal 1.2:** Provide comprehensive vocational rehabilitation services to job seekers who are blind or visually impaired resulting in the attainment of industry recognized credentials required for competitive integrated employment.

**Report of Progress Goal 1:** SCCB achieved significant progress on goal 1. In August of 2019, SCCB successfully completed the procurement process for the Career BOOST contract to deliver 4 out of 5 required Pre-ETS services in coordination with LEAs statewide. SCCB Transition Counselors serve all schools statewide and deliver Job Exploration Counseling, the fifth Pre-ETS service directly. Career BOOST is currently in an expansion phase in which additional services such as mentoring, Assistive Technology Training, and Braille are being added. These additional services will insure that students with visual disabilities will be equipped with the tools needed for credential attainment and competitive integrated employment. The number of students receiving Pre-ETS services has increased from approximately 10 in 2016 to 115 in 2019. SCCB has served several Potentially Eligible students during the previous year, most of who have opted to apply for SCCB services. 26 Students participated in Summer Teen 2019 and 15 students participated in summer work experiences. Transition Counselors continuously provide encouragement and support to facilitate graduation from high school and enrollment in post-secondary education. SCCB spent approximately 95% of Pre-ETS reserve funds and has strengthened partnerships with CRPs and LEAs statewide. SCCB has cohosted several Pre-ETS workshops, assisted with curriculum development, and provided technical assistance to Teachers for the Visually Impaired.

Beginning in 2019, SCCB VR Counselors participate in local workforce board meetings in order to develop employer relationships and facilitate job placement. 4 students graduated from the Summer Internship Program (SIP) which provides summer internships to college students. A total of 8 consumers graduated from the BRIDGE (Building Readiness through Individualized Development of Gainful Employment) job club program during the previous year.

**Goal 2:** Align resources, policy, and strategies to continuously improve competitive integrated employment outcomes for blind and visually impaired job seekers.

**Goal 2.1:** Develop and enhance job seeker work readiness and soft skills.

**Goal 2.2:** Enhance and improve job placement services and job support services for job seekers who are blind or visually impaired.

**Report of Progress Goal 2:** With partnerships and one-stop system engagement through infrastructure funding agreements, co-located offices and staff, center accessibility, and staff cross-training, SCCB has demonstrated its commitment to WIOA state partnerships. SCCB staff continue to make referrals to American Job Centers to facilitate job placement, however, SCCB consumers require substantially more support than they are offered at these centers; therefore, SCCB staff continue to assist with completing job applications, facilitating job searches, and providing Customized Employment and Supported Employment services. SCCB negotiated and entered into a number of Cooperative Agreements with community based qualified fee-for-service job coaching vendors and is exploring partnerships with job placement vendors to increase capacity and speed up delivery of job placement and job coaching services. As a portion of the Ellen Beach Mack Rehabilitation Center's strategic plan, SCCB has implemented a consumer orientation process to emphasize employment and job readiness services. Several Rehab Center courses were rewritten with a focus on employment in order to better prepare consumers for the world of work and VR Counselors are aligning career counseling, career exploration, and vocational goal planning with labor market information through the use of The Career Index +. SCCB staff continue to provide technology consultation to American Job Centers to ensure that SCCB consumers have access. The Training and Employment Department has developed several key employer partnerships that provide consumers with valuable work experience and job opportunities.

One such notable partnership developed in 2019 is with Conduent call center located in Columbia. SCCB provides extensive Assistive Technology training and testing at the Ellen Beach Mack Rehabilitation Center. Upon completion of training, and achievement of a passing score on an Assistive Technology proficiency test, consumers had the opportunity to interview with Conduent for call center opportunities. SCCB Training and Employment staff pre-screened consumers based on technology proficiency and job readiness and continue to provide follow up services to the consumer and employer after hire. Four consumers were hired through this program in 2019. SCCB is exploring development of additional job specific training programs across in-demand fields in the state.

**Objective 3:** Identify current and future needs of business and industry to support career pathways in growth sectors.

**Goal 3.1:** Increase agency utilization of Labor Market Information and business relationships to inform career exploration, vocational goal setting, service provision, and job placement.

**Goal 3.2:** Increase and improve talent acquisition and talent retention services to business in support of employees who are blind or visually impaired.

**Report of Progress Goal 3:** Under the previous state plan, SCCB focused efforts on building program capacity, resources and expertise needed in order to meet goal 3. Under the provisions of the previous Unified State Plan, SCCB has aligned VR Counseling, career exploration, vocational goal selection, and Individualized Plan for Employment development with labor market information and sector strategies. SCCB has instituted the use of The Career Index Plus for analyzing labor market information and helping consumers make informed job driven decisions. SCCB implemented significant staff training in the area of using labor market information and

understanding South Carolina's regional economic conditions. SCCB has established program capacity and resources to better serve individuals who have Most Significant Disabilities. SCCB has established JOBS Specialists who are providing Supported Employment and Customized Employment for the first time in SCCB's history. In addition, SCCB has hired and trained a Certified Work Incentive Counselor. SCCB established Career BOOST, a contractual program in partnership, collaboration, and coordination with Independent Living Centers, the National Federation of the Blind, and South Carolina's Local Education Authorities. This program provides the required Pre-Employment Transition Services to eligible and potentially eligible students with disabilities. SCCB VR Counselors and Employment Consultants participate on local workforce boards in order to develop relationships that will improve employment outcomes for consumers. SCCB VR Counselors have provided job retention services to both consumers and employers.

**Objective 4:** Engage job seekers, business leaders, and other workforce partners through marketing and outreach to articulate a value proposition to each.

**Goal 4.1:** Improve visibility and branding of SCCB with job seekers who are blind or visually impaired, businesses seeking to diversify labor market talent

**Goal 4.2:** Improve the visibility of SCCB within the Workforce Development System.

**Report of Progress:** Although SCCB has made significant progress on goal 4, much work remains. SCCB had recently hired a Director of Communications who will assist with marketing and branding to businesses and consumers. SCCB's BRIDGE program has made significant strides over the previous year and has assisted SCCB with gaining visibility in the workforce system. SCCB has over 200 employer relationships and staff forge new contacts daily. SCCB provides sensitivity trainings, technology consultation, and job retention services to employers and consumers, however, employers are often hesitant to hire SCCB consumers. Job applications are not always in accessible formats, and employer software is most often incompatible with screen reading and screen magnification software. For this reason, SCCB consumers continue to face barriers to employment despite SCCB's interventions.

(q) Quality, Scope, and extent of Supported Employment Services. *Include the following:*

(1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

(2) The timing of transition to extended services.

**Report of Progress:** SCCB plans to expend Supported Employment revenue during FFY 2020 for the first time as JOBS Specialists were on board and began providing services. Thus far, no supported employment placements have occurred in order to expend SE funds, but SCCB is hopeful that placements will result from dedicated staff and training of staff. Thus far no consumers served by Supported Employment funds have been transitioned to extended services, but SCCB did sign a Partnership Plus Agreement with Able SC to provide on-going supports at the time when a consumer transitions from VR support. Building a quality Supported Employment program is a continued goal of SCCB for FFY 2020. Currently SCCB is undergoing extensive Customized Employment training and technical assistance to build capacity and program effectiveness. SCCB is seeking external vendors to develop partnerships to

increase capacity for Supported Employment and solicitations are being developed for this purpose.

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

SCCB experienced long periods of vacancy in the JOBS specialist and VR counselor positions. This created impediments with delivering the necessary services. At this time all positions are filled and a more consistent training process has been developed.

**2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:**

**A. Identify the strategies that contributed to the achievement of the goals**

Consumers being served by SE funds are currently in the placement and support phase, therefore no consumers served by Supported Employment funds have been transitioned to extended services at this time. SCCB signed a Partnership Plus Agreement with Able SC to provide ongoing supports at the time when a consumer transitions from VR support. Building a quality Supported Employment program is a continued goal of SCCB for FFY 2020. SCCB also assisted our benefits counselor in becoming certified through SSA.

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

SCCB has gone through major changes in the Leadership Team. SCCB has seen vacancies and new hires in primary positions including Commissioner, Director of Operations, VR Consumer Services Director, Transition Coordinator, Counselor Trainer, as well as several counselor positions. This has caused a major learning curve and change in agency culture on many levels.

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

SCCB has been working to build the information technology infrastructure to track and report the following performance accountability indicators under section 116 of WIOA:

(I) the percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program; (II) the percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program; (III) the median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program; (IV) the percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent (subject to clause (iii)), during participation in or within 1 year after exit from the program; (V) the percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment; and (VI) the indicators of effectiveness in serving employers established pursuant to clause (iv).

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

- SCCB improved WIOA partnerships and One-Stop System Engagement through the strategies of formalizing American Job Center partnerships with Memorandum's of Understanding which include infrastructure cost agreements, specified co-located staff office times and space, center accessibility, and staff cross training.
- SCCB has active MOU's with all SC Works Centers. SCCB worked with core WIOA partner programs to create agency cross training modules for partnership workforce staff and explored data sharing and common intake opportunities. SCCB finalized a Cooperative

Agreement with SC Department of Education and is currently negotiating an update to the SC Vocational Rehabilitation Department Cooperative Agreement.

- SCCB negotiated and entered into a number of Cooperative Agreements with community based qualified fee-for-service vendors and other partners to expand capacity and available resources statewide. This has expanded program capacity to provide independent travel training (eight new vendors), home management training (two new vendors), and Braille Literacy (two new vendors) in community settings.
- SCCB also provides Zoom Text, Jaws, and other assistive technology training through a fee-for-service contract with the National Federation of the Blind of South Carolina. SCCB established contractual programs for Pre-Employment Transition Services with South Carolina's Independent Living Centers and the National Federation of the Blind.
- SCCB conducted public awareness outreach and implemented a social media presence to enhance agency visibility. In 2017, SCCB rewrote the curriculum and courses offered at the Ellen Beach Mack Rehabilitation Center for Employment and Independence. This new curriculum includes pre-test and post-test assessments to measure skill gains and provide for continuous improvement. Several new center programs have been implemented, including a partnership with Adult Education that brings GED preparation instruction and testing to the center. SCCB added a Basic Financial Literacy course using curriculum designed by the Consumer Financial Protection Bureau. SCCB has also added Soft-Skills training based on the "Skills to Pay the Bills" curriculum
- . SCCB has instituted the use of The Career Index Plus for analyzing labor market information and helping consumers make informed job driven decisions. SCCB implemented significant staff training in the area of using labor market information and understanding South Carolina's regional economic conditions.
- SCCB leveraged partnerships with the Department of Employment and Workforce, and the Job Driven Technical Assistance Center to provide staff with training on sector strategies, the talent pipeline efforts, and the use of labor market information.
- SCCB has established program capacity and resources to better serve individuals who have Most Significant Disabilities. SCCB has established JOBS Specialists who are providing Supported Employment and Customized Employment, evidence-based practices that have not been offered by SCCB in the past. In addition, SCCB has hired and trained a Certified Work Incentive Counselor to help beneficiaries understand the implications of gainful employment on their Social Security benefits.
- SCCB established Career BOOST, a contractual program in partnership, collaboration, and coordination with Independent Living Centers, the National Federation of the Blind, and South Carolina's Local Education Authorities. This program provides the required Pre-Employment Transition Services to eligible and potentially eligible students with disabilities.
- SCCB is undergoing extensive Customized Employment training and technical assistance to build capacity and program effectiveness.

#### *q. Quality, Scope, and Extent of Supported Employment Services*

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Include the following:

**1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities**

SCCB has a Partnership Plus Agreement with Able SC to provide ongoing supports at the time when a consumer transitions from VR support. Building a quality Supported Employment program is a continued goal of SCCB for FFY 2020.

**2. The timing of transition to extended services**

In compliance with 34 CFR 363.6 SCCB policy requires that an individual must transition to extended services within 24 months of starting to receive supported employment services unless a longer time period is agreed to in the individualized plan for employment. SCCB policy requires supported employment outcomes to be in competitive integrated employment.

***Vocational Rehabilitation (Blind) Certifications***

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States must provide written and signed certifications that:

**1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];**

Enter the name of designated State agency or designated State unit, as appropriate  
South Carolina Commission for the Blind

**2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17] , the Rehabilitation Act, and all applicable regulations[18] , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;**

Enter the name of designated State agency  
South Carolina Commission for the Blind

**3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19] , the Rehabilitation Act, and all applicable regulations[20] , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;**

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below

Darline Graham

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below

Commissioner

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

**Footnotes**

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

## Certification Signature

SIGNATORY INFORMATION	ENTER SIGNATORY INFORMATION IN THIS COLUMN
NAME OF SIGNATORY	Darline Graham
TITLE OF SIGNATORY	Commissioner
DATE SIGNED	March 27, 2020

**Assurances**

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

THE STATE PLAN MUST INCLUDE	INCLUDE
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan: <ul style="list-style-type: none"> <li>a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act</li> <li>b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):               <ul style="list-style-type: none"> <li>(A) "is an independent State commission" (Yes/No)</li> <li>(B) "has established a State Rehabilitation Council" (Yes/No)</li> </ul> </li> <li>c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act</li> <li>d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share</li> </ul>	Yes No

THE STATE PLAN MUST INCLUDE	INCLUDE
of the cost of carrying out the VR program in accordance with section 101(a)(3)	
e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	

**THE STATE PLAN MUST INCLUDE****INCLUDE**

<p>f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act</p> <p>g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act</p> <p>h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act</p> <p>i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs</p> <p>j. With respect to students with disabilities, the State,</p> <ul style="list-style-type: none"> <li>i. Has developed and will implement, <ul style="list-style-type: none"> <li>I. Strategies to address the needs identified in the assessments; and</li> <li>II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and</li> </ul> </li> <li>ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))</li> </ul>	
<p>5. Program Administration for the Supported Employment Title VI Supplement:</p> <ul style="list-style-type: none"> <li>a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act</li> <li>b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act</li> <li>c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act</li> </ul>	
<p>6. Financial Administration of the Supported Employment Program:</p> <ul style="list-style-type: none"> <li>a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act</li> <li>b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used</li> </ul>	

THE STATE PLAN MUST INCLUDE	INCLUDE
<p>only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act</p> <p>7. Provision of Supported Employment Services:</p> <ul style="list-style-type: none"> <li>a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act</li> <li>b. The designated State agency assures that: <ul style="list-style-type: none"> <li>i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act</li> <li>ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act</li> </ul> </li> </ul>	Yes

## *Vocational Rehabilitation Program Performance Indicators*

### **Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

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PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
CREDENTIAL ATTAINMENT RATE	Baseline	Baseline	Baseline	Baseline
MEASURABLE SKILL GAINS	14.0%	22.0%	17.2%	23.0%
EFFECTIVENESS IN SERVING EMPLOYERS	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

## VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

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States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program—and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.<sup>24</sup> If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

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

### Temporary Assistance for Needy Families (TANF)

#### DISCLAIMER

South Carolina’s four-year WIOA Combined State Plan submitted on March 31, 2020 was approved, and took effect July 1, 2020, covering program years 2020 through 2023 (July 1, 2020 through June 30, 2024). However, that decision did not constitute a determination on the program-specific requirements of the Combined State Plan for those programs administered by Federal agencies other than the U.S. Departments of Labor and Education:

- the Temporary Assistance for Needy Families (TANF) program authorized under 42 U.S.C. 601 et seq., administered by the U.S. Department of Health and Human Services; and
- the Employment and Training programs under the Supplemental Nutrition Assistance Program (SNAP) authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 administered by the U.S. Department of Agriculture.

While SNAP has received federal approval, the TANF program is in modification as of April 23, 2021. The state plan can also be accessed via the [wioaplans.ed.gov](http://wioaplans.ed.gov) website.

- a. Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act)*
- 

The TANF Program is built around two primary components, set forth below:

1. Work Program & Self-Reliance

- The program provides temporary financial assistance and work training and education programs that lead to individuals' social and economic independence.

2. Prevention Programs

- Prevention programs focus on (a) teen pregnancy prevention, (b) strengthening and maintaining intact families, (c) assisting in the reunification of troubled families, and (d) providing short-term services and resources to resolve crisis situations that might result in welfare dependency.

### Work Program and Self-Reliance

South Carolina will refer work eligible individuals receiving assistance to a TANF work program case manager for development of the TANF Family Plan. The Family Plan outlines the overall strengths and growth areas within the family and actions necessary to achieve self-reliance. The assessment process involves gathering and analyzing information on external and internal factors that affect the client to determine the current level of employability and work readiness. Assessments include screenings to identify potential barriers that may affect the client's ability to participate in work or work-related activities. Screening results may be used to refer to local service providers or qualified specialists who will provide assistance to minimize barriers such as substance abuse, physical or learning disabilities, domestic violence and other impediments to employment.

DSS will require each work-eligible individual to sign an individual employment plan. The individual employment plan is an agreement between the recipient and DSS that describes the actions necessary to fulfill the vocational goals and time frames for completing those actions. Each work-eligible individual will be placed in work-related activities consistent with his/her skills, education, experience and competence. Work activities may include: employment, on-the-job-training, job search, job readiness activities, work experience, community service programs, vocational educational activities, job skills training or educational activities. Those caretaker relative families identified as "Child-Only" will not be required to participate in the TANF work program as they are exempt from work requirements and will not require an individual employment plan. The individual employment plan is also inclusive of the entire family and set forth steps that family members can take to attain a higher level of individual functioning.

### Job Search Requirement as a Condition of Eligibility

DSS will require TANF applicants, identified as work-eligible, to conduct an initial job search. Applicants who meet the criteria outlined in Section 2.4 #1 of the TANF Manual are exempt from the initial job search requirement.

Applicants considered young custodial parents (YCP) are required to conduct an initial job search as a condition of TANF eligibility. County staff will provide job search information during the initial interview with the YCP applicant. Young custodial parents:

- Are between the ages of 18-25;
- Do not have a high school diploma, GED or certificate of completion; and
- Have a child under the age of 12 months.

The YCP must make and document a minimum of five employer contacts during the application process. It is recommended that the search be completed within two weeks. Failure to complete the job search without good cause (good cause reasons are those generally considered to be beyond the control of the applicant) will result in denial of the application.

### TANF Child Care and Support Services

DSS is committed to providing support services for clients based on individual needs. Child care and support services are available to assist an applicant of the TANF program in order for them to conduct

the initial job search, participate in approved job preparation activities, and obtain or maintain employment.

Also, clients participating in an approved educational or training activity, or who have become employed may receive support services. Support services include, but are not limited to, child care, transportation, prescription eyeglasses, physical exams, automobile repairs/car expenses, parenting programs, safety equipment, criminal records checks, and relocation assistance. Support services include coordination with other agencies for services such as alcohol and drug counseling, health services (non-medical treatment), housing services, vocational rehabilitation, mental health services and referral services, at no cost to the agency.

To allow parents to go to work, the State will provide reimbursement for child care pursuant to the state plan for the Child Care and Development Fund (CCDF), including the principle that parents will have the right to choose the child care arrangement that best meets the needs of their children. Under the CCDF plan, the State may provide funds for care by providers who meet the State's child care regulatory requirements or for qualifying self-arranged informal child care.

The State has established criteria, procedures, and definitions for determining whether a parent is unable to obtain needed child care so that a parent's failure to work or attend training on that basis may be addressed.

### Work Training Allowance

A Work Training Allowance (WTA) is an allowance paid to a DSS Work Experience or Community Service Program participant if the number of monthly hours of work experience or community service participation multiplied by the federal minimum wage exceeds the combined dollar value of SNAP and TANF cash benefits. If the family is entitled to a WTA allowance, it must be provided as a supplemental TANF benefit.

### Participation in Employment Preparation Programming

As part of the program's requirements, each adult and minor parent recipient determined by the case manager to be in need of employment skills training must participate in an employment preparation activity. These activities include, but are not limited to, job readiness training and supervised job search.

### Employment Retention and Advancement

The TANF Program emphasizes pre-employment job keeping skills and offers post-employment services designed to ensure continuous attachment to the labor force. In order to foster employment stability, transitional services such as child care are provided. Other retention services may be offered including intensive case management, follow-up contacts and home visits, referrals to community resources, banking and financial management, and re-employment assistance. Special services and resources may be offered to employed clients to assist in their job progression and career advancement such as employment counseling, access to job leads and skill enhancement training.

### Transitional Child Care

Transitional child care will be provided, based on available funding, for up to 24 months to individuals who meet the following eligibility criteria:

- 1) TANF recipients who no longer receive a cash payment due to loss or declination of earned income disregards or increased earnings.
- 2) TANF recipients who formerly received a cash payment and who were employed at the time their case was closed.
- 3) TANF recipients who formerly received a cash payment and whose cash payments were terminated due to the 24-month time limit expiration; who became employed and (a)

request assistance within 24 months from TANF case closure and (b) whose income did not exceed 85% of the State Median Income.

- 4) TANF recipients who formerly received a cash payment and an increase in child support income causes the TANF case to close when an adult household member is employed.
- 5) TANF recipients who formerly received a cash payment, had earned income, and requested the removal of earned income disregards, but this does not result in a case closure. The recipient can submit a request for voluntary case closure due to earned income.
- 6) A household member becomes employed or increases earnings during a full family sanction, and the earnings cause the household to become ineligible. In this situation, a TANF mini budget must be completed to determine if excluded earned income or refusal of disregards would cause the TANF case to close.

Eligibility will cease if any of the following occurs:

- 1) The recipient no longer has a dependent child in the home.
- 2) Employment ends (a 30-day interruption to go from one job to another job will be deemed continuous employment).
- 3) The client's income exceeds 85% of the State Median Income.

Assistance may be provided for up to 24 months from the first month of eligibility. Sanctioned clients may qualify for transitional child care by obtaining a full-time job and "curing" the sanction.

The state will expect the parent to make a co-payment based on a sliding fee scale. Parents will have the right to choose the child care arrangement that best meets the need of their child(ren). Payments will be made to providers who meet the State's child care regulatory requirements. Self-arranged, informal care arrangements that do not meet the State's child day care regulatory requirements will be paid for, if prescribed basic health and safety standards are met.

### Work Program Sanction Exemptions

- The only parent in the home with a child under one year of age; however, custodial parents under age 25 who have not completed their high school education are required to comply with these provisions regardless of the age of the child;
- At least six months pregnant and the pregnancy is verified by a qualified licensed health care provider;
- Incapacitated and the incapacity is verified by a physician as clearly precluding the recipient from engaging in current or future gainful employment, education or training;
- Caring for an incapacitated child in the home or other adult relative whose incapacity has been verified by a physician and, if DSS considers it necessary, confirmed by an assessment performed by the Department of Vocational Rehabilitation; or
- Unable to participate because appropriate child care or reasonable transportation was not provided.

### Domestic Violence Option

DSS will provide waivers of certain program requirements (residency, child support, family cap, time limits and work requirements) pursuant to a determination of good cause of normal program requirements for so long as necessary in cases where compliance would make it more difficult for such individuals to escape domestic violence.

TANF applicants and recipients will be screened to identify individuals with a history of domestic violence. DSS has contracted with domestic violence service providers to provide comprehensive training on domestic violence to all TANF case managers.

Referrals to the local domestic violence agency for counseling and support services will be made upon identification of an individual with a history of domestic violence. Cases referred will be jointly staffed by DSS and the local domestic violence agency to develop a collaborative service plan designed to lead to self-reliance.

### **Sanctions for Failure to Comply with Employment and Training Requirements Contained in Employment Plans**

Recipients not meeting the work program exemption criteria described in 3.1.7, who fail without good cause to comply with the employment and training requirements contained in the individual employment plan will be sanctioned in the following manner:

- 1) A 30-day conciliation period will be granted the recipient to discuss a failure to meet the terms of the individual employment plan. During the 30-day period the recipient may (a) establish good cause for failure to meet the terms of the individual employment plan, (b) agree to meet, in the future, the terms of the individual employment plan, or (c) terminate the conciliation process. If at the end of the conciliation process the participant does not comply, TANF benefits must be terminated by imposing a full-family sanction. The recipient has the right to appeal the Department's decision to impose a sanction. At the end of the appeal period, if the Fair Hearing decision is not in the recipient's favor, all TANF benefits must be terminated. Benefits may be reinstated when the recipient agrees to comply according to the terms of the agreement and demonstrates a willingness to comply by participating in the employment and training program or obtaining a full-time job for a period of 30 days.
- 2) Terminate all benefits if the recipient completes the training requirements contained in the individual employment plan and then refuses an offer of employment without good cause.

### **Requirement for Treatment of Alcohol and/or Drug Abuse**

DSS may require the following recipients of benefits to participate in an alcohol or drug treatment program approved by the Department of Alcohol and Other Drug Abuse Services (DAODAS) as a part of their individual employment plan. If the recipient refuses, he/she is ineligible for benefits.

TANF recipients will be referred to DAODAS for clinical assessment for participation in an alcohol or drug treatment program who:

- Have been identified by a case manager, with concurrence from a supervisor, as possibly in need of alcohol or other drug abuse treatment services using screening indicators provided by DAODAS; or
- Have within six months prior to the date of last application for TANF or have subsequently been convicted of an alcohol or drug related offense; or
- Within six months prior to the date of last application for TANF or subsequently gives birth to a child who tests positive for drugs.

Determination that substance abuse treatment is necessary will be made by appropriate clinical staff approved by DAODAS. Such staff will also assess the participant's compliance with the treatment program using recognized methods of assessment including, but not limited to, random testing. In no instance shall failure to pass a random test by itself constitute a noncompliance with treatment. For participants who complete the approved DAODAS treatment program, DSS will monitor their compliance with the individual employment plan using recognized methods of assessment including, but not limited

to, random testing. Failure to pass such a random test for use of alcohol shall not constitute the basis for a sanction, but may constitute grounds for review by a clinical professional who will determine if there are additional indicators of substance abuse or grounds for resumption of treatment. DSS may sanction for noncompliance with the individual employment plan those participants who complete treatment and fail to pass a random test for use of illegal drugs.

DSS will keep records of an individual's alcohol and drug treatment participation confidential and will not release this information to law enforcement personnel.

TANF funds are not used for medical services per 408(a)(6) of the Social Security Act.

#### **Resource Limit**

The resource limit for all liquid resources and real property, excluding homestead property, is \$2,500 for applicant and recipient households.

#### **Vehicles**

One licensed/registered automobile per licensed driver in the household (passenger car or other motor vehicle) is excluded. If a household member owns a vehicle that is not licensed/registered, the equity value of this vehicle is counted against the \$2500 resource limit. A household member may own more than one vehicle as long as the number of vehicles does not exceed the number of licensed drivers. The following vehicles are also excluded:

- Vehicles owned by or used to transport a disabled person;
- Vehicles essential to self-employment;
- Income producing vehicles; and
- Vehicles used as a home.

#### **Earned Income Disregards**

Provided the household has passed the 185% gross income limit test, the State will disregard from earned income:

- 50% of the monthly gross countable earned income of each individual whose needs are included in the budget for the first four months in which earned income is countable. This is a onetime only disregard.
- \$100 per month from gross countable income of each individual whose needs are included in the budget, for the remaining months of eligibility after the four months in (1) above have been exhausted.

#### **Earned Income of Minors**

The earned income of any minor in the household of an adult specified relative is excluded in the eligibility and benefit determination.

#### **Interest and Dividend Income**

Interest and dividend income up to \$400 per year per household is disregarded in the eligibility and benefit determination.

#### **Time Limits**

Under State Law, a family may receive TANF benefits for no more than 24 months out of 120 months. The exceptions are:

## VII. PROGRAM

- An adult household member is permanently or totally disabled, whether physically or mentally and the disability is expected to last 90 days or longer. The disabled are exempted under state law and are being served in a solely funded State program.
- An adult household member is providing full-time care for a disabled family member living in the home.
- The teen parent/adult (both parents in a two-parent household) of the child(ren) for whom assistance is received is a minor under the age of 18 who has not completed high school. Assistance must be provided for a period of up to 24 months after the minor parent attains the age of 18 or completes high school, whichever occurs first.
- Child care or transportation is not reasonably available for participation in work requirements.
- The adult caretaker relative is not the parent of the child and is not included in the TANF cash benefits.
- An adult household member is providing a home for and caring for a child whom DSS has determined to be abandoned by his or her parents and for whom the alternative placement is foster care.
- An adult household member is involved in an approved training/education program set forth on his/her individual employment plan that will not be completed by the 24th month. An extension is granted for up to six months when the training/education program has a fixed beginning and ending date and has a specific job/vocational goal. If the program has not been completed by the 30th month and satisfactory progress toward completion is being made, the County Director may grant month-to-month extensions for as long as necessary to complete the program and secure employment.
- Any household that contains two parents in the TANF grant, including sanctioned or disqualified parents. These clients are being served in a solely funded State program. Households that contain an SSI parent or an ineligible alien will not be considered a two-parent household.

Households not meeting any of the time limit exception criteria above are subject to the 24-month time limit from the point in which the household begins receiving benefits, regardless of the time in which they become job ready.

TANF allows for up to 20% of the TANF caseload to be extended beyond the federal 60-month time limit due to hardship reasons. If one or more of the following criteria are met, an extension beyond the 60 months should be given:

- A family member is a victim of domestic violence and the family member is enrolled in a program supervised by a recognized domestic violence advocate.
- The family has an open case with Child Protective Services.
- As a result of the Family Plan, an adult household member is active in a recognized substance abuse treatment program.
- The family has reached the federal time limit, but has not yet reached the State 24-month time limit due to months received in another state. This is an extension reason only. If an applicant is ineligible in another state due to federal time limits, he/she must meet a state time limit exemption to become eligible in South Carolina.
- An adult in the household is working a full-time job but is still eligible for a TANF benefit.

### Family Cap

DSS will not increase benefits to an eligible family as a result of a child born to that parent 10 or more months after the family begins to receive TANF benefits. This requirement does not apply if the State determines that the child was conceived as a result of rape or incest.

DSS may provide benefits for a child born after 10 months in the form of vouchers that may be used to pay for goods and services as determined by DSS, that permit the child's custodial parent to participate in education, training and employment related activities.

### Recipients under the Age of 18 Must Attend School

TANF recipients under the age of 18 must be enrolled in school and maintain satisfactory attendance, as defined by the South Carolina Department of Education, as a condition of eligibility for benefits, unless they have attained a high school diploma, GED or certificate of completion.

### Requirement to Provide Certain Information for Child Support Purposes and Sanctions for Failure to Provide

As a condition of eligibility applicants and recipients of TANF must provide:

- The first and last name of the absent parent and putative father and any known license(s) which might be subject to revocation; and
- At least two of the following items on each absent parent and each putative father named:  
(a) Date of birth; (b) Social Security Number; (c) Last known home address; (d) Last known employer's name and address; (e) Either of the absent parents' name and address.

An applicant or recipient who fails to provide this information or who provides the names of two putative fathers, both of whom are excluded from paternity by genetic testing, is ineligible for assistance for herself and the child for whom parental information was not provided unless the applicant or recipient verifies there is good cause for not providing this information. Good cause includes, but is not limited to, documentation of incest, rape, or the existence of or the threat of physical abuse to the child or custodial parent.

When paternity is legally established for a child in sanctioned status, TANF benefits may be granted, if all other eligibility requirements are met.

### Disregard of Cash Value of Life Insurance

The cash value of life insurance is disregarded for any person whose resources must be counted in determining TANF eligibility.

### Reporting Requirements

TANF recipients shall report the following changes within ten days:

- A change in the composition of the household;
- A change of address;
- Employment status which includes obtaining a job or losing a job, hours of employment or rate of pay; or
- Source of income.

When it is determined that a household member temporarily living away from home will not return, the recipient must report this within five days.

Failure to report any of the above changes does not excuse the recipient from repayment of benefits in the situation where failure to report caused an overpayment of the TANF benefit.

## Annual Review

There will be at least one redetermination of eligibility factors every 12 months with a required interview.

## Legal Basis of the TANF Program

The State operates the TANF Program under the following provisions:

- Title IV-A of the Social Security Act, as amended.
- Title 45, Code of Federal Regulations, Parts 260-265.
- South Carolina Code of Laws of 1976, Title 43, Social Services, Chapter 5, Public Aid, Assistance and Relief Generally, Articles 1, 5 and 9.
- South Carolina State Regulations, Chapter 114, Article 11, Family Independence Program.
- The South Carolina Department of Social Services TANF Policy Manual.

## Delivery of Services to Needy Families

Services will be provided to needy families whose income is equal to or less than 200% of the Federal Poverty Guidelines issued by the U.S. Department of Health and Human Services. There is no resource test in order to receive these services. Services provided in the following paragraph will meet goal one as stated in section 1.1 of this State Plan.

Services such as the following will be available; however, some of them may only be available in selected counties:

- Intensive case management and treatment services for low income parents (and their children) that are in need of addiction services for alcohol or other drug abuse.
- Preschool programs will be offered with services that assist parents in promoting optimal early childhood development, school readiness, and in reducing the risk of children developing major physical, developmental and learning problems. These programs will help ensure that children arrive at school ready to learn and will increase the likelihood of eventual self-reliance.
- After school and summer programs will be offered to students with services that provide students with basic and remedial educational services, recreational activities, life skills classes, enhancement of self-esteem, health education and parental involvement activities.
- A unified literacy program, incorporating components from early childhood education, adult literacy or adult basic education, and parenting education programs, will be made available to low income clients.

Other services to be provided include psychological evaluations, family and group counseling, case management including home visitation, and community based assessment to determine the type of crisis intervention necessary to maintain the family or to expedite family reunification.

*b. Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)*

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South Carolina will refer work eligible individuals receiving assistance to a TANF work program case manager for development of the TANF Family Plan. The Family Plan outlines the overall strengths and

growth areas within the family and actions necessary to achieve self-reliance. The assessment process involves gathering and analyzing information on external and internal factors that affect the client to determine the current level of employability and work readiness. Assessments include screenings to identify potential barriers that may affect the client's ability to participate in work or work-related activities. Screening results may be used to refer to local service providers or qualified specialists who will provide assistance to minimize barriers such as substance abuse, physical or learning disabilities, domestic violence and other impediments to employment.

DSS will require each work-eligible individual to sign an individual employment plan. The individual employment plan is an agreement between the recipient and DSS that describes the actions necessary to fulfill the vocational goals and time frames for completing those actions. Each work-eligible individual will be placed in work-related activities consistent with his/her skills, education, experience and competence. Work activities may include: employment, on-the-job-training, job search, job readiness activities, work experience, community service programs, vocational educational activities, job skills training or educational activities. Those caretaker relative families identified as "Child-Only" will not be required to participate in the TANF work program as they are exempt from work requirements and will not require an individual employment plan. The individual employment plan is also inclusive of the entire family and set forth steps that family members can take to attain a higher level of individual functioning.

The recipient is exempt from the employment and training sanctions of the individual employment plan if the recipient is:

- The only parent in the home with a child under one year of age; however, custodial parents under age 25 who have not completed their high school education are required to comply with these provisions regardless of the age of the child;
- At least six months pregnant and the pregnancy is verified by a qualified licensed health care provider;
- Incapacitated and the incapacity is verified by a physician as clearly precluding the recipient from engaging in current or future gainful employment, education or training;
- Caring for an incapacitated child in the home or other adult relative whose incapacity has been verified by a physician and, if DSS considers it necessary, confirmed by an assessment performed by the Department of Vocational Rehabilitation; or
- Unable to participate because appropriate child care or reasonable transportation was not provided.

*c. Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance*

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To ensure that individuals receiving assistance are engaging in work, there is a sanctioning process in place for noncompliance. South Carolina will refer work eligible individuals receiving assistance to a TANF work program case manager for development of the TANF Family Plan. The Family Plan outlines the overall strengths and growth areas within the family and actions necessary to achieve self-reliance. The assessment process involves gathering and analyzing information on external and internal factors that affect the client to determine the current level of employability and work readiness. Assessments include screenings to identify potential barriers that may affect the client's ability to participate in work or work-

related activities. Screening results may be used to refer to local service providers or qualified specialists who will provide assistance to minimize barriers such as substance abuse, physical or learning disabilities, domestic violence and other impediments to employment.

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- Incapacitated and the incapacity is verified by a physician as clearly precluding the recipient from engaging in current or future gainful employment, education or training;
- Caring for an incapacitated child in the home or other adult relative whose incapacity has been verified by a physician and, if DSS considers it necessary, confirmed by an assessment performed by the Department of Vocational Rehabilitation; or
- Unable to participate because appropriate child care or reasonable transportation was not provided.

In order to increase economic stability and greater levels of economic self-sufficiency, DSS provides TANF outreach services that provide information about TANF and related services or programs for which low income families might be eligible, including Medicaid, SCHIP, school lunch and other benefits. Outreach services include an informational brochure, provided to all recipients of the Supplemental Nutrition Assistance Program (SNAP) with income less than 200% of the federal poverty level.

Any SNAP custodial or non-custodial parent or responsible relative of a child may also receive employment services that include, but are not limited to the following: orientation, assessment, case management, employment plan development, barrier resolution, job search skill training, resume and soft skill development, job placement services, support services, retention and re-employment services. These services meet TANF purposes 1 and 2, and do not provide basic income support or constitute "assistance" under the Federal rules.

*d. Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)*

DSS restricts the use and disclosure of information about individuals and families receiving assistance in accordance with South Carolina State Regulations, Chapter 114, Article 11, Section 114.1170, Safeguarding Information. However, DSS may disclose confidential information to agencies and entities outside the Department, that provide services to recipients to enable them to become independent and self-reliant when DSS has the recipient's signed release form on file stating that he/she consents to the release of confidential information regarding his/her household.

*e. Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)*

The State considers prevention programs to be critical in assisting families to provide safe, stable nurturing environments for their children. The following prevention programs will accomplish these goals.

DSS contracts with entities to provide abstinence until marriage teen pregnancy prevention programs and services within the State. The programs provide an abstinence first, age appropriate comprehensive approach to health and sexuality education with a goal of preventing adolescent pregnancy throughout South Carolina.

*f. Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)*

DSS believes that as part of the educational efforts it will provide in programs designed to promote responsible fatherhood, encourage marriage, and build character and higher self-esteem, statutory rape prevention issues will be discussed and training will be provided. TANF workers are required to report cases of suspected abuse or neglect to the Child Welfare Division/Human Services.

DSS partners with the SC Center for Fathers and Families, a faith-based organization, whose mission is to develop and support a statewide infrastructure deeply invested in repairing and nurturing relationships between fathers and families. The Center for Fathers and Families works with six local fatherhood programs in 11 locations to deliver quality, father-friendly services throughout South Carolina. The program addresses ways to overcome obstacles to becoming an engaged and responsible father by focusing on a wide range of topics such as improving employment status, family relationships, effective communication, job readiness, child support and the legal system, financial management, parenting and co-parenting, healthy relationships, men's health and education.

DSS partners with the SC Campaign to Prevent Teen Pregnancy which provides programs/trainings engages adult males and also addresses the problem of statutory rape. Programs provided by the SC Campaign to Prevent Teen Pregnancy include information regarding legal definitions and consequences of statutory rape and the SC law regarding the age of consent. Training is designed to reach state and

local law enforcement officials, community educators which include teachers, coaches, nurses and other health professionals such as those providing counseling services.

DSS through its domestic violence and batterers intervention programs provides assistance for victims, their dependents, and perpetrators of intimate partner violence. The goals of the domestic violence programs are to prevent and/or reduce the incidence of domestic violence and ensure accessible emergency shelter and related assistance to those in need of services for the intervention and prevention of intimate partner violence as well as for treatment for perpetrators. Domestic violence programs work with multiple government and non-government agencies to address the serious problem of domestic violence in our state and to reduce domestic violence in South Carolina. DSS partners with other state agencies such as South Carolina Coalition Against Domestic Violence and Sexual Assault (SCCADVASA), Department of Public Safety and the Department of Health and Environmental Control in an effort to develop and sustain the best methods in domestic violence prevention.

*g. Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)*

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South Carolina provides TANF benefits through three methods:

- Paper checks – for recipients who have demonstrated electronic card misuse or recipients without the appropriate demographic information to establish a bank account;
- Deposit into a debit account with a branded MasterCard (ePay); and
- Direct deposit into a personal account by state procedure, limited to non-parents with custody of the TANF eligible child(ren).

South Carolina does not use Electronic Benefits Transfer (EBT) for cash programs.

TANF recipient payments delivered electronically to debit accounts, called ePay, are set up by a contracted vendor. The only funds deposited in the account are those issued by DSS and can be accessed only by the debit card. ePay accounts are governed by FDIC regulations. In South Carolina, any TANF recipient, without the appropriate demographic information, will receive benefits in the form of a paper check.

Instructional material and information regarding the ePay cards, TANF restrictions, benefit access, customer service, fees, etc., are issued, upon approval, to recipients in a cardholder "Welcome Packet" by our contractor.

### Benefit Access and Fee Information:

- South Carolina recipients receive information on how to access benefits without paying fees as well as applicable fees and surcharge information. The recipient is free to choose the most advantageous and safest method to access his/her benefits. Access to benefits is not limited to locations at which cash is provided. Recipients may access benefits at automated teller machines (ATM) or use Point-of-Sale (POS) devices to make purchases at locations that accept MasterCard. Recipients have free access when the ePay card is used in transactions at U. S. merchants and retailers or when they receive cash back with a purchase. POS transactions allow "cash-back" options at no additional charge.

- Recipients are allowed free, teller-assisted "over the counter" cash transactions at any bank or credit union that accepts MasterCard for the dollar amount of the recipient's choosing. Recipients are allowed two ATM cash withdrawals for no fee per month at MoneyPass® ATMs. A \$1.50 fee will be assessed for each additional ATM withdrawal. Out-of-Network ATM withdrawals will also assess \$1.50 fee for withdrawals not conducted at MoneyPass® ATMs. ATM owners and operators may charge an additional fee called "surcharge" or "convenience fee" to use their ATM. DSS state office staff review the fees charged monthly in order to monitor and evaluate the utilization of the funds. The ePay card can be used for electronic bill paying via the internet.

Information regarding applicable fees and surcharges are included in the recipient's "Welcome Packet" and are also included on an "ePay Flyer" in the Resource Library of the DSS website that is available to the public. [https://dss.sc.gov/resource-library/forms\\_brochures/files/1202.pdf](https://dss.sc.gov/resource-library/forms_brochures/files/1202.pdf)

***h. Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)***

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South Carolina State Regulation 114-1150 – Determination of Benefits – provides the TANF benefit restrictions. 114-1150(F) states that TANF payments are not to be accessed, by electronic transaction using a Point-of Sale device, ATM, or access to an online system for the withdrawal of funds or the processing of a payment for merchandise or a service, at any of the following locations:

- A liquor store. A liquor store means any retail establishment which sells exclusively or primarily intoxicating liquor. Such term does not include a grocery store which sells both intoxicating liquor and groceries including staple foods (within the meaning of section 3(r) of the Food and Nutrition Act of 2008(7U.S.C. 2012(r)).
- A casino, gambling casino or gaming establishment.
- An adult oriented entertainment establishment which is defined as a retail establishment that provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment are prohibited.

Merchant Category Code blocks were placed on the SC ePay cards to prevent the use of the ePay cards at the retailer types listed below:

- Package Stores/Beer/Wine/Liquor
- Betting/Track/Casino/Lotto

DSS provides information to new ePay TANF clients which give details on how to access TANF benefits and restrictions described above.

DSS includes TANF restrictions in written notices sent at initial approval and at annual redetermination.

Posters with restrictions have been distributed to all 46 county offices and provided to partners contracted by DSS to serve our TANF population.

DSS has placed the restriction information on the DSS webpage, at [www.dss.sc.gov](http://www.dss.sc.gov).

South Carolina does not allow the operation of casinos within its borders, nor does the one federally recognized Indian tribe in South Carolina operate a casino on tribal land. Adult entertainment businesses are not regulated by state licensing or local regulations, nor are there unique Merchant Classification Codes for adult entertainment businesses. Local governments default to local ordinances for nuisance businesses (e.g., tattoo shops, chicken or pig operations, etc.), if there are issues relating to a local business. The MCC used by some of these businesses is the same as can be used by theaters or museums (i.e., entertainment or education). DSS continues to seek avenues to address this unregulated group.

*i. Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)*

Families who move into the State from another state will have their eligibility determined under the program requirements of the South Carolina TANF Program. South Carolina will not apply standards from the applicants' previous state of residence. Note: Months of TANF benefits received in another state will be identified and counted against the federal five-year limit.

*j. Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)*

Applicants and recipients of TANF benefits must be citizens of the United States or qualified aliens within the scope of TANF eligibility as described in Section 4.4, *South Carolina Department of Social Services TANF Policy Manual*.

In addition to U.S. citizens, certain non-citizens who otherwise qualify may also be eligible for benefits.

The following groups of non-citizens may receive benefits if all other requirements are met, for up to five years from either the date the status is granted or from the date of entry:

- Refugees, Asylees, Amerasians, Cuban/Haitian entrants and aliens whose deportation is withheld.
- Victims of severe forms of trafficking (those forced into prostitution, slavery, or forced labor) through coercion, threats of violence, psychological abuse, torture, and imprisonment.
- Aliens granted parole for at least one year under Section 212 (d)(5) of the INA, aliens battered or subjected to extreme cruelty in the U.S., and aliens granted conditional entrant refugee status before April 1, 1980.

Lawful permanent residents who have worked or can be credited with working in the United States for 40 qualifying quarters under Title II of the Social Security Act.

*k. Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)*

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Applicants and recipients of the TANF Program are granted appeal rights from decisions they deem to be adverse. When a hearing is requested within ten days after the receipt of an adverse notice, the TANF benefits are not continued unless the recipient specifically requests in writing that they be paid pending the hearing decision. The recipient must be informed that an adverse hearing decision will require the repayment of benefits paid pending the hearing decision. Fair hearings for TANF applicants and recipients are provided for in South Carolina State Regulations, R. 114-110. The specific procedures for a Fair Hearing are found in the *South Carolina Department of Social Services TANF Policy Manual*.

*I. Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—*

1. Providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or

2. In other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

As a WIOA Partner, DSS is connected with the State's workforce system to stay informed about high-demand occupations. In an effort to better align and coordinate programs that help individuals prepare for competitive employment, TANF representatives are co-located in each of the comprehensive SC Works Centers across the state. This strategic co-location has proven to be beneficial in co-enrolling TANF participants in WIOA or other partner programming. TANF's involvement in the WIOA MOU has resulted in better coordination of services at the local level. Local TANF representatives are involved in business services discussions, job fair planning, and general service delivery.

Project HOPE is a collaborative initiative funded by a U.S. Department of Health and Human Services' Health Professions Opportunity Grant (HPOG), which provides funding for training and employment in the allied health field for low-income individuals (TANF and SNAP recipients), veterans, and youth aging out of foster care. (Low-income is defined as an annual income less than 200 percent of the federal poverty level.) Project HOPE offers an array of short-term certifications through partnerships with the state's technical colleges which will allow students to move along an educational pathway that leads to higher paying jobs along a career ladder. Many Project HOPE participants move into the eldercare field following an introduction to healthcare, in general.

*m. Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)*

As a condition of receiving federal TANF funds, states are required to spend a certain amount of their own funds ("Maintenance of Effort") on TANF-allowable categories. South Carolina's State MOE funds are expended in the following categories:

- Basic Assistance: cash payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).
- Education and Training Activities: secondary education; adult education, GED or equivalent and ESL classes; education directly related to employment; job skills training; education provided as vocational educational training or career and technical education; and post-secondary education.
- Early Care and Education:
  - Child Care (spent or transferred): child care expenditures for families that need child care to work, participate in work activities or for respite purposes. Also includes funds transferred to Child Care and Development Fund (CCDF) Discretionary.
  - Pre-Kindergarten/Head Start: pre-kindergarten or kindergarten education programs, expansion of Head Start programs, or other school readiness programs.
- Program Management: administrative costs and systems costs related to monitoring and tracking under the program.

### TANF Certifications

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

THE STATE PLAN MUST INCLUDE	INCLUDE
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act) —	

## THE STATE PLAN MUST INCLUDE

## INCLUDE

	(A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
	(B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4.	Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5.	Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6.	(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— <ul style="list-style-type: none"> <li>i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;</li> <li>ii. refer such individuals to counseling and supportive services; and</li> <li>iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.</li> </ul>	Yes Yes Yes

## Employment and Training Programs Under the Supplemental Nutrition Assistance Program (Programs Authorized Under Section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

### a. General Requirements [27]

The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:

[27] 7 CFR § 273.7(c)(6)

1. The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed;

**Supervised Job Search**

Supervised job search requires an E&T Program participant to make a specified number of job contacts. The job search begins on a date agreed upon by the E&T Program participant and E&T Coordinator. Only SNAP recipients who are deemed "work ready" will be placed in the supervised job search component. The job search period will typically begin after the completion of orientation and assessment activities.

SCDSS has approved the following locations for the supervised job search component for FY 2020.

- The South Carolina Works Centers (South Carolina's One-Stop delivery system). The SC Works Centers have physical locations that cover every county in South Carolina. SCDSS SNAP E&T Coordinators have been co-located in these centers and will have the responsibility to provide supervision for E&T participants engaging in the supervised job search component. E&T Coordinators also have the ability to track the timing and activities of the participants.
- Third-Party Reimbursement Program contracted partner agencies who provide job search activities will also be approved locations for the supervised job search component. These providers will be required to physically supervise, monitor and track all E&T participants' job search activities at their contracted sites/locations.
- ABAWDs can complete 20 hours of job search per week at the SC Works Centers utilizing the state's labor department's online employment system. Each job search (submitted job application) equals two hours of participation.

The SC Works locations were chosen as approved Supervised Job Search Sites for the following reasons:

- SC Works have computer lab locations statewide.
- SCDSS SNAP E&T Coordinators are housed at all of the comprehensive SC Works Centers statewide. The E&T Coordinators will be able to:
  - schedule and supervise SNAP participants during their job search activities,
  - evaluate to ensure job search activities are effective,
  - provide case management to remediate barriers,
  - provide guidance to ensure participants are applying for positions for which they qualify,
  - provide regular contact with participants to evaluate outcomes (interviews or employment offers)
- E&T Coordinators have access to the SC Works Online System (SCWOS) which tracks job searches. All E&T participants are registered in SCWOS.
- SCWOS will track the timing and activities of all E&T participants.

TPRP sites that provide supervised job search were also chosen as approved Supervised Job Search sites and will be required to provide the same method of supervision as described above.

## VII. PROGRAM

All supervised job searches will be limited to 30 days for each participant with a maximum of 60 days per year. The 60 days cannot be consecutive for the following reasons:

- SNAP E&T participants can only participate in supervised job search for 30 days to allow E&T Coordinators and TPRP providers the opportunity to remediate any barriers to employment before exhausting the 60-day annual limit.
- If an E&T participant is unsuccessful after the initial 30 days of supervised job search, E&T Coordinators and TPRP providers can assist participants through referrals to additional E&T services as deemed necessary in order for the participant to be successful.
- E&T Coordinators and TPRP provider will provide case management services to monitor job search activities to ensure participants are marketable to potential employers.

GEOGRAPHIC AREA	TARGET AUDIENCE (E.G. HOMELESS, RE-ENTRY POPULATION, ABAWDS)	ANTICIPATED MONTHLY PARTICIPANTS (UNDUPLICATED COUNT)	ANTICIPATED MONTHLY COST*	PROVIDER(S)	REPORTING MEASURE(S) IF > 100 PARTICIPANTS PER YEAR
STATEWIDE	SNAP recipients	<p>17% of the projected participation</p> <p>59 Participants</p>	<p>\$23,673.76</p> <p>Funds will be utilized to provide intensive case management</p>	SCDSS	Number and percentage of total supervised job search participants who obtain unsubsidized employment within the reporting period (FY2020)

### Job Search Training

Job search training will provide meaningful assistance to SNAP recipients helping to improve their ability to get a job. Job search training activities will be conducted locally based on the available resources and will be designed to meet the needs of job seekers and employers.

Activities may include, but are not limited to: employability skills, interpersonal skills, basic job search skills, job retention skills, interviewing skills, appropriate dress, resume development, career assessments, guidance, and motivation for development of positive work behaviors necessary for the labor market.

ABAWD participation in the job search training component will be limited to 9 hours per week. This component may be combined with other ABAWD qualifying components.

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GEOGRAPHIC AREA	TARGET AUDIENCE (E.G. HOMELESS, RE-ENTRY POPULATION, ABAWDS)	ANTICIPATED MONTHLY PARTICIPANTS (UNDUPLICATED COUNT)	ANTICIPATED MONTHLY COST*	PROVIDER(S)	REPORTING MEASURE(S) IF > 100 PARTICIPANTS PER YEAR
STATEWIDE	SNAP recipients	21% of the projected participation  73 participants	\$29,244.05	SC Works  SCDSS  TPRP Partner Agencies	Number and percent of total job search training participants who obtain unsubsidized employment within the reporting period

### Job Retention Services

Job retention services are a time-limited training and support process that assist the individual in assessing job needs and provides assistance and resources when a client gains employment after participating in another E&T component. South Carolina will allow up to 30 days of retention services per year regardless of number of times client participates in the employment and training program. Job retention services include but are not limited to:

- Counseling/Case Management
- Support services/Transportation
- Referrals to other services/Navigation Services
- Clothing required for employment
- Equipment or tools required for employment
- Test fees
- Licensing and certifications
- 

GEOGRAPHIC AREA	TARGET AUDIENCE (E.G. HOMELESS, RE-ENTRY POPULATION, ABAWDS)	ANTICIPATED MONTHLY PARTICIPANTS (UNDUPLICATED COUNT)	ANTICIPATED MONTHLY COST*	PROVIDER(S)	REPORTING MEASURE(S) IF > 100 PARTICIPANTS PER YEAR
STATEWIDE	SNAP recipients	2% of the projected participation	\$2,785.14	SCDSS	Number and percent of total participants

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GEOGRAPHIC AREA	TARGET AUDIENCE (E.G. HOMELESS, RE-ENTRY POPULATION, ABAWDS)	ANTICIPATED MONTHLY PARTICIPANTS (UNDUPLICATED COUNT)	ANTICIPATED MONTHLY COST*	PROVIDER(S)	REPORTING MEASURE(S) IF > 100 PARTICIPANTS PER YEAR
		7 Participants	Funds will be utilized to provide intensive case management		maintaining unsubsidized employment for 90 days within the reporting period (FY2019)

### Basic Education

The basic education component is designed to increase employability by providing remedial and post-secondary education leading to a GED or certification.

SNAP clients may be referred to basic education activities that include adult basic and/or foundational skills instruction. This component will increase the participant's ability to perform math or other activities necessary for the attainment of a secondary school diploma or equivalent, transition to post-secondary education and training, and obtain employment.

Educational expenses will not be paid for training that is normally available to the public at no cost.

E&T funds may be used only if:

- Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education program costs are associated with E&T program engagement.

Education may be combined with job search, job search training, or other qualifying components.

GEOGRAPHIC AREA	TARGET AUDIENCE (E.G. HOMELESS, RE-ENTRY POPULATION, ABAWDS)	ANTICIPATED MONTHLY PARTICIPANTS (UNDUPLICATED COUNT)	ANTICIPATED MONTHLY COST*	PROVIDER(S)	REPORTING MEASURE(S) IF > 100 PARTICIPANTS PER YEAR
STATEWIDE	SNAP recipients	28% of the projected participation	\$38,992.07	South Carolina Office of Adult Education	Number and percent of basic education participants who obtained GEDs,

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	97 Participants	Funds will be utilized to provide intensive case management	TPRP Partner Agencies	HS Diplomas or Work Keys / WIN certifications within the reporting period (FFY2020)
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### Career and Technical Education Programs (Vocational Training)

This component provides vocational training or equivalent knowledge and skills required in a specific occupational area. The focus of the vocational training component will be the "Quick Jobs" program and other similar certificate and non-certificate programs which allow participants to quickly obtain skills matching the needs of local businesses and industries. Quick Jobs and other certificate programs have been developed for fields where job growth is expected and in consultation with local employers. The Quick Jobs program offers training and certifications with most courses lasting three months or less but all courses last less than one year.

Examples of Quick Jobs certificate and non-certificate programs include welding, manufacturing, information technology, healthcare, customer relations, and basic construction skills.

GEOGRAPHIC AREA	TARGET AUDIENCE (E.G. HOMELESS, RE-ENTRY POPULATION, ABAWDS)	ANTICIPATED MONTHLY PARTICIPANTS (UNDUPLICATED COUNT)	ANTICIPATED MONTHLY COST*	PROVIDER(S)	REPORTING MEASURE(S) IF > 100 PARTICIPANTS PER YEAR
STATEWIDE	SNAP recipients	30% of the projected participation  104 Participants	\$41,777.22	SCDSS has entered into agreements with technical colleges	Number and percent of total career and technical education participants who obtain an industry recognized credential/certification/certificate within the reporting period (FFY2020)

### Workfare

The workfare component is being offered in order to enhance the employability of program participants. Workfare provides individuals with an opportunity to gain work experience and useful workplace skills at a supervised worksite. In lieu of wages, workfare participants receive

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compensation in the form of their household's monthly SNAP allotment. Workfare may be combined with job search, job search training, or other components.

Worksites and worksite agreements are developed and executed by SNAP E&T Coordinators. Each county has signed an agreement with worksites that outlines requirements for working conditions and requires data exchanges such as reporting participation hours in the management information system. SCDSS' E&T program provides workman's compensation insurance for participants in the workfare program.

An individual may identify a worksite that has not yet been developed by the agency. However, the individual cannot be assigned to workfare at the worksite until an agreement with the site has been executed by the E&T Coordinator for the county involved.

Volunteer placements for the Workfare component are made at public, non-profit organizations.

The number of volunteer monthly hours needed for ABAWDs equal to the result obtained by dividing a household's SNAP allotment by the State's minimum wage.

GEOGRAPHIC AREA	TARGET AUDIENCE (E.G. HOMELESS, RE-ENTRY POPULATION, ABAWDS)	ANTICIPATED MONTHLY PARTICIPANTS (UNDUPLICATED COUNT)	ANTICIPATED MONTHLY COST*	PROVIDER(S)	REPORTING MEASURE(S) IF > 100 PARTICIPANTS PER YEAR
STATEWIDE	ABAWDs	1% of the projected participation  3 Participants	\$1,392.57	SCDSS	Number and percent of workfare participants who obtain unsubsidized employment within the reporting period (FFY2020)

### Work Experience

The work experience component is being offered in order to enhance the employability of E&T Program participants. SNAP E&T participants can volunteer to work in any agency or organization to gain work experience.

Placements are made at public and private sector employers as well as for-profit agencies. All SNAP clients (ABAWDs included) can volunteer for up to 20 hours a week, alone or combined with other activities.

The majority of SNAP clients assigned to this component will have little or no work history. Other participants may need training or are re-entering the job market after a long absence.

This activity is designed to increase participant job skills by providing actual work experience or training opportunities.

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GEOGRAPHIC AREA	TARGET AUDIENCE (E.G. HOMELESS, RE-ENTRY POPULATION, ABAWDS)	ANTICIPATED MONTHLY PARTICIPANTS (UNDUPLICATED COUNT)	ANTICIPATED MONTHLY COST*	PROVIDER(S)	REPORTING MEASURE(S) IF > 100 PARTICIPANTS PER YEAR
STATEWIDE	ABAWDs	1% of the projected participation  3 Participants	\$1,392.57	SCDSS	Number and percent of work experience participants who obtain unsubsidized employment within the reporting period (FFY2020)

2. An operating budget for the Federal fiscal year with an estimate of the cost of operation for each Federal fiscal year covered by the Combined Plan. Any State agency that requests 50 percent Federal reimbursement for State agency E&T administrative costs, other than for participant reimbursements, must include in its plan, or amendments to its plan, an itemized list of all activities and costs for which those Federal funds will be claimed, including the costs for case management and casework to facilitate the transition from economic dependency to self-sufficiency through work. Costs in excess of the Federal grant will be allowed only with the prior approval of FNS and must be adequately documented to assure that they are necessary, reasonable and properly allocated. A State must submit a plan amendment to request budget adjustments at least 30 days prior to planned implementation;

	STATE COST	FEDERAL COST	TOTAL
<b>I. DIRECT COSTS</b>			
A) SALARY/WAGES	0	881,974	881,974
B) FRINGE BENEFITS* APPROVED FRINGE BENEFIT RATE USED: ___.49__ %		432,167	432,167
C) CONTRACTUAL COSTS (ADMIN ONLY)	7,568,502	7,713,502	15,282,004
D) NON-CAPITAL EQUIPMENT AND SUPPLIES	0	12,000	12,000
E) MATERIALS	0	10,000	10,000
F) TRAVEL	0	15,000	15,000
G) PATHWAYS SCHOLARSHIP	0	40,000	40,000
H) EQUIPMENT & OTHER CAPITAL EXPENDITURES	0	0	0
<b>TOTAL DIRECT COSTS</b>	7,568,502	9,104,643	16,673,145
<b>II. INDIRECT COSTS</b>			

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	STATE COST	FEDERAL COST	TOTAL
INDIRECT COSTS* APPROVED INDIRECT COST RATE USED: ____%	0	134,948	134,948
<b>III. IN-KIND CONTRIBUTION</b>			
STATE IN-KIND CONTRIBUTION	0	0	0
<b>TOTAL ADMINISTRATIVE COST (TOTAL OF ITEMS I, II, AND III)</b>	7,568,502	9,239,591	16,808,093
100 PERCENT FEDERAL E&T GRANT		1,671,089	1,671,089
50 PERCENT ADDITIONAL ADMINISTRATIVE EXPENDITURE	7,568,502	7,568,502	15,137,004
<b>IV. PARTICIPANT REIMBURSEMENT (STATE PLUS FEDERAL)</b>			
A) DEPENDENT CARE (INCLUDING CONTRACTUAL COSTS)	0	0	0
B) TRANSPORTATION & OTHER COSTS (INCLUDING CONTRACTUAL COSTS)	469,590	469,590	939,180
C) STATE AGENCY COST FOR DEPENDENT CARE SERVICES	0	0	0
<b>TOTAL 50 PERCENT PARTICIPANT REIMBURSEMENT EXPENSES</b>	469,590	469,590	978,360
<b>V. TOTAL COSTS</b>	8,038,092	9,709,181	17,747,273

ITEM	NARRATIVE
I. DIRECT COSTS	<p><b>One (1) Full Time E&amp;T Program Director</b> to provide oversight of overall program operation and supervision of State Agency SNAP E&amp;T staff and coordinate activities with SNAP Program Director, E&amp;T Coordinators and other State Agency staff as appropriate. Salary + Fringe = <b>\$81,283 (100% Funds)</b></p> <p><b>Five (5) E&amp;T Program Support Staff</b> to monitor county reporting processes and compliance with SNAP E&amp;T policy and procedures; collect and compile monthly participation data to support the submission of required federal reports; monitor participant reimbursement and ensure adequate funding is available consistently to support county operations; assist with management and evaluation reviews of county offices; manage special projects designed to enhance the operation of the E&amp;T program, manage support services for SNAP recipients and provide supervision of staff assigned to special projects; manage the reimbursement process and other fiscal activity associated with the Third-Party Reimbursement Program (50/50 Program). Salaries + Fringe = <b>\$315,230 (100% Funds)</b></p>
A) SALARY/WAGES	<p><b>Fourteen (14) E&amp;T Program Coordinators</b> to develop and implement an employment and placement strategy for SNAP E&amp;T participants for their geographic assignment area. E&amp;T Coordinators interact with workforce development staff, employers and other partners to develop part-time and full-time employment and training opportunities for their participants. Salaries + Fringe = <b>\$748,520 (100% Funds)</b></p> <p><b>Two (2) E&amp;T Program Specialists</b> responsible for operating and providing E&amp;T services aboard the E&amp;T mobile computer lab. Salaries + Fringe = <b>\$119,200 (100% Funds)</b></p> <p><b>One (1) E&amp;T Program Navigator</b> assigned to provide technical assistance for Third-Party Reimbursement Program partner agencies. The Navigator will provide technical assistance with operating the SCCETS database, data entry, invoicing, orientations and training when needed. Salaries + Fringe = <b>\$49,906 (100% Funds)</b></p>
B) FRINGE BENEFITS*	
APPROVED FRINGE BENEFIT RATE USED ____%	.49

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ITEM	NARRATIVE
C) CONTRACTUAL COSTS	<p>SCDSS is contracting with the state's SC Works Centers to co-locate E&amp;T Coordinators in the comprehensive centers across the state.</p> <p><b>\$100,000 (100% Funds)</b></p> <p>SCDSS is seeking to contract with the SC Department of Education to organize and develop a bus driver training program.</p> <p><b>\$45,000(100% Funds)</b></p> <p>SCDSS will contract with non-profit agencies, State agencies, technical colleges and for-profit organizations to provide Employment and Training services for SNAP clients.</p> <p><b>Providers \$7,568,502</b>  <b>Federal Funds \$7,713,502</b>  <b>Total Cost \$15,282,004</b></p>
PATHWAYS SCHOLARSHIP PROGRAM (PSP)	<p>Funds will be utilized to provide scholarships for tuition and books for SNAP recipients attending approved certification programs.</p> <p><b>\$40,000 (100% Funds)</b></p>
D) NON-CAPITAL EQUIPMENT AND SUPPLIES	<p>Funds will be utilized to purchase printers, ink cartridges and other needed office supplies.</p> <p><b>\$12,000 (100% Funds)</b></p>
E) MATERIALS	<p>Funds will be utilized to purchase office supplies. Copy paper, pens, calendars, scissors, staplers and all other essential materials will be purchased for the operation of the Employment and Training Program.</p> <p><b>\$10,000 (100% Funds)</b></p>
F) TRAVEL	<p>Frequent travel is required in order to effectively administer the Employment and Training Program in South Carolina. The E&amp;T Coordinators are responsible for multiple counties. They travel daily in order to conduct orientations and case management for SNAP clients. The State office staff supervisory staff conducts announced and unannounced monitoring visits throughout the state which also requires a significant amount of travel.</p> <p>E&amp;T staff must also travel for various meetings and trainings throughout the year.</p> <p><b>\$15,000(100% Funds)</b></p>
G) BUILDING/SPACE	N/A
H) EQUIPMENT & OTHER CAPITAL EXPENDITURES	N/A
II. INDIRECT COSTS	
COST ALLOCATION	<p>These funds will be used for indirect cost associated with the administration of the SNAP E&amp;T program (lights, telephone, office space, etc.).</p> <p><b>\$134,948 (100% Funds)</b></p>
III. STATE IN-KIND CONTRIBUTION	N/A
IV. PARTICIPANT REIMBURSEMENTS	

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ITEM	NARRATIVE
A) DEPENDENT CARE	<p>N.A</p> <p>South Carolina will provide reimbursement funds for participants needing reimbursement for transportation in the amount of up to \$75 monthly during component participation. Reimbursement will also be provided for one-time component-related expenses in the amount of \$100 provided the participation occurred in a SNAP E&amp;T component for that month.</p> <p>SNAP participants who have gained employment after participating in the E&amp;T program can receive up to a maximum of \$125 if enrolled in the E&amp;T job retention program. Note that funds for expenses and reimbursements may be paid directly to the provider or to the participant.</p>
B) TRANSPORTATION & OTHER COSTS	<p>Additionally, one time rent assistance will be available for E&amp;T program participants in danger of being evicted. The maximum assistance will be \$1,000.00 for this one-time support service.</p> <p><i>Participant Reimbursement Costs:</i>  <b>State \$200,000</b>  <b>State Revenue \$25,000</b>  <b>Federal \$225,000</b>  <b>Total Participant Reimbursement Costs: \$450,000</b></p> <p><i>Third Party Reimbursement Program Participant Reimbursements</i>  <b>Providers \$244,590</b>  <b>Federal \$244,590</b>  <b>Total TPRP Participant Reimbursement: \$489,180</b></p>
C) STATE AGENCY COST FOR DEPENDENT CARE SERVICES	N/A

3. The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions;

I. ANTICIPATED NUMBER OF WORK REGISTRANTS IN THE STATE DURING THE FEDERAL FY (UNDUPLICATED COUNT):	165,797
II. ESTIMATED NUMBER OF WORK REGISTRANTS EXEMPT FROM E&T	100%
III. PERCENT OF ALL WORK REGISTRANTS EXEMPT FROM E&T (LINE II/LINE I)	100%
IV. ANTICIPATED NUMBER OF MANDATORY E&T PARTICIPANTS (LINE I - LINE II)	0
V. ANTICIPATED NUMBER OF VOLUNTARY E&T PARTICIPANTS	4,142
VI. ANTICIPATED NUMBER OF ABAWDS IN THE STATE DURING THE FEDERAL FY	75,974
VII. ANTICIPATED NUMBER OF ABAWDS IN WAIVED AREAS OF THE STATE DURING THE FEDERAL FY	0

VIII. ANTICIPATED NUMBER OF ABAWDs TO BE EXEMPTED UNDER THE STATE'S 12 PERCENT ABAWD EXEMPTION ALLOWANCE DURING THE FEDERAL FY	9,117
IX. NUMBER OF POTENTIAL AT-RISK ABAWDs EXPECTED IN THE STATE DURING THE FEDERAL FY (LINE VI-(LINES VII+VIII))	66,857

4. The characteristics of the population the State agency intends to place in E&T;  
All SNAP recipients who able to work are eligible for South Carolina's SNAP E&T program.
5. The estimated number of volunteers the State agency expects to place in E&T;  
South Carolina's SNAP E&T program is voluntary. Anticipated monthly participation is provided in the component details (Section 1).
6. The geographic areas covered and not covered by the E&T Plan and why, and the type and location of services to be offered;  
South Carolina's SNAP E&T program is available statewide or in all 46 counties.
7. The method the State agency uses to count all work registrants as of the first day of the new fiscal year;  
SNAP eligibility staff will determine each individual's eligibility and work registration status at application and recertification. During these interviews, eligibility staff will discuss and record the work registration status of each household member and advise the household of work registration requirements and penalties. A determination will be made to identify work registrants who are ABAWDs and under the time limited eligibility requirements. The determination of a participant's status is based on information provided and verified during the intake process. ABAWD work registrants will be provided an explanation of their rights and responsibilities and the requirement to either work or participate in a qualifying work program to maintain their eligibility.
8. The method the State agency uses to report work registrant information on the quarterly Form FNS-583;  
SNAP eligibility staff will determine each individual's eligibility and work registration status at application and recertification. During these interviews, eligibility staff will discuss and record the work registration status of each household member and advise the household of work registration requirements and penalties. The determination of a participant's status is based on information provided and verified during the intake process. This data is recorded in the state's Client History and Information Profile (CHIP) system and then retrieved on both a monthly and quarterly basis for the Form FNS 583.
9. The method the State agency uses to prevent work registrants from being counted twice within a Federal fiscal year. If the State agency universally work registers all SNAP applicants, this method must specify how the State agency excludes those exempt from work registration under 7 C.F.R. §273.7(b)(1). If the State agency work registers nonexempt participants whenever a new application is submitted, this method must also specify how the State agency excludes those participants who may have already been registered within the past 12 months as specified under 7 C.F.R. §273.7(a)(1)(i);  
In order to ensure an unduplicated count a report is generated to identify the number of Work Registrants in the state as of October 1<sup>st</sup>. New Work Registrants added during October and the remainder of the fiscal year are checked against the master list before being reported as a new Work Registrant to ensure an unduplicated count.

**10. The organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the Statewide workforce development system, if available. FNS is specifically concerned that the lines of communication be efficient and that noncompliance by the participant be reported to the certification unit within 10 working days after the noncompliance occurs;**

SCDSS eligibility staff are responsible for all actions related to determining SNAP eligibility including: intake, certification, and recertification. Upon the approval of an initial SNAP application or annual recertification, SCDSS eligibility staff will notify SNAP recipients about the availability of the E&T Program.

During the application process the eligibility worker determines if a client meets the eligibility criteria to receive SNAP benefits. Once eligibility has been established the applicants are screened to determine if the client meets any Work Registration exemptions. If the client does not meet an exemption, the worker codes them as a Work Registrant (WR). The worker then determines if the applicant meets an ABAWD exemption. If the client does not meet an exemption, the client is coded as an ABAWD and is sent an approval notice that informs them of their ABAWD status and the work requirements associated with receiving SNAP benefits for more than three months. The letter also informs the client of various participation options in order to meet the work requirement. The SNAP E&T program is one of the options available to an ABAWD to meet the work requirement. All WRs receive notification about the SNAP E&T program.

Project HOPE, WIOA, and the programs under the SC Fathers and Families umbrella are work programs that will provide assistance to SNAP clients in South Carolina. The South Carolina SNAP E&T Program will coordinate with other existing employment programs, including TANF and WIOA, to enhance services available to E&T participants.

**11. The relationship between the State agency and other organizations it plans to coordinate with for the provision of services, including organizations in the Statewide workforce development system, if available. Copies of contracts must be available for inspection;**

South Carolina's SNAP E&T program contracts services with community based organizations, technical colleges, and state agencies for the provision of services statewide. Contracts specify the allowable E&T components and services to be provided.

**12. The availability, if appropriate, of E&T programs for Indians living on reservations after the State agency has consulted in good faith with appropriate tribal organizations;**

SCDSS contacted the Director of Family Services and the Vocational Coordinator at the Catawba Indian Nation in Rock Hill, South Carolina during FY 2019. Program information was provided to both individuals. A meeting has been scheduled for Oct 1, 2019 for a collaboration of services.

In previous years, SCDSS has consulted with the Catawba Nation in South Carolina and provided information regarding the Employment and Training program. SCDSS informed the Catawba Nation representatives of the availability of services for Native Americans living on the reservation. SCDSS has offered the Catawba Nation full access to all E&T programs in South Carolina. The E&T services offered are as follows: outreach, assessment, case management, job search training, job search, workfare, work experience, basic adult education, vocational training in a variety of short-term certificate programs, job placement, job retention services, Pathways scholarships and support services.

**13. If a conciliation process is planned, the procedures that will be used when an individual fails to comply with an E&T program requirement. Include the length of the conciliation period; and**

South Carolina operates a voluntary SNAP E&T program for FY2020 and, therefore, the conciliation policy is not applicable.

**14. The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.**

Child care will be available on a limited first come first serve basis for SNAP recipients with children while participating in the E&T program. Eligible children must also be in the SNAP household budget. The state agency will provide child care for all E&T participants. Child care will be available on a limited first come, first served basis for SNAP E&T participants with children. Eligible children must also be in the SNAP household budget. Additionally, TPRP agencies can receive reimbursements for dependent care costs.

**15. The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.**

South Carolina will provide reimbursement funds for participants needing reimbursement for transportation in the amount of up to \$75 monthly during component participation. Reimbursement will also be provided for one-time component-related expenses in the amount of \$100 provided the participation occurred in a SNAP E&T component for that month.

SNAP participants who have gained employment after participating in the E&T program can receive up to a maximum of \$125 if enrolled in the E&T job retention program. Note that funds for expenses and reimbursements may be paid directly to the provider or to the participant.

Additionally, one time rent assistance will be available for E&T program participants in danger of being evicted. The maximum assistance will be \$1,000.00 for this one-time support service.

**Participant Reimbursement Costs:**

State	\$200,000
State Revenue	\$25,000
Federal	\$225,000
Total Participant Reimbursement Costs:	\$450,000

**Third Party Reimbursement Program Participant Reimbursements**

Providers	\$244,590
Federal	\$244,590
Total TPRP Participant Reimbursement:	\$489,180

**16. Information about expenses the State agency proposes to reimburse. FNS must be afforded the opportunity to review and comment on the proposed reimbursements before they are implemented.**

Participant reimbursements often make the difference between continued unemployment and the participant's ability to get a job or participate successfully in the E&T Program. SNAP recipients who volunteer to participate in the E&T Program are also eligible for participant reimbursements; however, priority for the limited participant reimbursement funds will be granted to ABAWDs. Each county has developed a process to provide participant reimbursements to SNAP recipients. The method used by counties may vary from purchasing bus tickets in bulk, gas cards or by providing funds directly to clients. Transportation assistance funding is limited to a maximum of \$75 monthly per participant.

Reimbursements may also be provided up to \$100 for one-time component related expense resulting from E&T participation in an allowable activity. Examples of this would be uniforms or work tools needed to participate in a component. This reimbursement may only be provided one time each federal fiscal year per participant. Payments may be made directly to the SNAP E&T participant or directly to providers.

Reimbursements are allowable for statewide background checks, drug testing and medical when needed as a prerequisite for SNAP clients attending certification programs through the SNAP E&T Third Party Reimbursement Program.

Rent assistance is available for E&T program participants in danger of being evicted while participating in an allowable component in the SNAP E&T program based on the availability of funds. The maximum assistance will be up to \$1,000 for this one-time (lifetime) support service.

Child care will be available on a limited first come first serve basis for SNAP recipients with children while participating in the E&T program. Eligible children must also be in the SNAP household budget. The state agency will provide child care for all E&T participants. Child care will be available on a limited first come, first served basis for SNAP E&T participants with children. Eligible children must also be in the SNAP household budget. Additionally, TPRP agencies can receive reimbursements for dependent care costs.

Oversight of the reimbursements are tracked and monitored through the SCDSS' Family Independence Financial System (FIFN). FIFN records reimbursements paid to providers by the provider and the participant. Reports are generated from this system monthly.

South Carolina's support service budget is \$450,000 for FY 2019-2020. This amount is sufficient based on historical data. The budget will be monitored monthly, however, if funds become insufficient to complete the entire fiscal year, South Carolina will request additional funding.

**b. Able-bodied Adults without Dependents (ABAWD) [28]**

1. A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs) subject to the 3- month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA:

[28] 7 CFR § 273.7(c)(7)

**1. Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;**

I. IS THE STATE AGENCY PLEDGING TO OFFER QUALIFYING ACTIVITIES TO ALL AT-RISK ABAWDs?	N/A
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II. INFORMATION ABOUT THE SIZE & NEEDS OF ABAWD POPULATION.	N/A
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III. THE COUNTIES/AREAS WHERE PLEDGE SERVICES WILL BE OFFERED.	N/A
IV. ESTIMATED COST TO FULFILL PLEDGE.	N/A
V. DESCRIPTION OF STATE AGENCY CAPACITY TO SERVE AT-RISK ABAWDS.	N/A
VI. MANAGEMENT CONTROLS IN PLACE TO MEET PLEDGE REQUIREMENTS.	N/A
VII. DESCRIPTION OF EDUCATION, TRAINING AND WORKFARE COMPONENTS STATE AGENCY WILL OFFER TO MEET ABAWD WORK REQUIREMENTS.	N/A

**2. Estimated costs of fulfilling its pledge;**

South Carolina will not operate as a "pledge state" for FFY2020.

**3. A description of management controls in place to meet pledge requirements;**

South Carolina will not operate as a "pledge state" for FFY2020.

**4. A discussion of its capacity and ability to serve at-risk ABAWDs;**

South Carolina will not operate as a "pledge state" for FFY2020.

**5. Information about the size and special needs of its ABAWD population; and**

South Carolina will not operate as a "pledge state" for FFY2020.

**6. Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement**

South Carolina will not operate as a "pledge state" for FFY2020.

### Trade Adjustment Assistance (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Yes

### Jobs for Veterans' State Grants

(OMB Control Number: 1225-0086)

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported quarterly on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

*a. How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;*

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**Employment, Training and Job Placement Services**

The state will provide employment, training, and job placement services to veterans and eligible persons in accordance with the Jobs for Veteran's State Grant (JVSG) by:

- targeting services to veterans and eligible persons with significant barriers to employment (SBE),
- placing Local Veterans Employment Representatives (LVER) staff throughout the state to reach out and promote the benefits of hiring veterans to employers, and
- developing strategies within the business service team which facilitate the promotion of increased employment of veterans.

An eligible veteran or eligible spouse is determined to have a SBE if he or she attests to belonging to at least one of the criteria below:

- A special disabled or disabled veteran, as those terms are defined in 38 USC §4211(1)(3); special disabled and disabled veterans are those:
  - who are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
  - were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 USC 11302(a) and (b)), as amended, to include domestic violence and other dangerous or life-threatening conditions affecting permanent residence;
- A recently-separated service member, as defined in 38 USC §4211(1)(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by the Workforce Innovation and Opportunity Act Section 3(38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3(36)).

Additional veteran populations identified by DOL as eligible for DVOP services include:

- Veterans aged 18-24—veterans who may possess limited civilian work history which can make transitioning to the civilian labor force difficult, and thus may benefit from individualized career services provided by a DVOP specialist.
- Vietnam-era Veterans—eligible veterans who served any part of their active military, naval, or air service during the Vietnam era. The Bureau of Labor Statistics and the Veterans Affairs data indicate that there are still a sizable number of Vietnam-era Veterans in the workforce, and many face difficulty in finding and maintaining employment. The Vietnam-era falls within the following timeframes:
  - The period beginning on February 28, 1961, and ending on May 7, 1975, in the case of a veteran who served in the Republic of Vietnam during that period; and

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- The period beginning on August 5, 1964, and ending on May 7, 1975, in all other cases.
- Eligible Transitioning Service Members, Spouses, and Family Caregivers—in annual appropriation bills since the Consolidated Appropriations Act of 2014, Congress has authorized the JVSG program to support individualized career services to:
  - Transitioning members of the Armed Forces who have been identified as in need of individualized career services;
  - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities (MTFs) or warrior transition units (WTUs); and
  - The spouses or other family caregivers of such wounded, ill, or injured members.
    - The term "caregiver" with respect to an eligible veteran means an individual who provides personal care services to the veteran.
    - The term "family caregiver" with respect to an eligible veteran means a family member who is a caregiver of the veteran.
    - The term "family member" with respect to an eligible veteran means an individual who (a) is a member of the family of the veteran, including parent, spouse, child, step-family member, and extended family member; or (b) lives with, but is not a member of the family of the veteran.

Veterans who do not fall into one of the categories that are served by DVOP specialists are eligible to be served by non-JVSG SC Works staff on a priority basis.

DVOPs are required to take an active role in seeking out and assisting these targeted groups by networking with other local, state, and federal government agencies. DVOPs also develop partnerships with veteran service organizations, community service organizations, LWDA partners, faith based organizations, and any other entities that are dedicated to locating and serving veterans in need and helping them with the purpose of providing individualized career services so they are able to successfully compete in the job market. South Carolina Department of Employment and Workforce acknowledge that homeless veterans are not likely to seek our services on their own and that an "under the bridge" approach is to be taken by DVOPs, encouraging them to go where these individuals can be found. In locations where there is access to organizations such as US DOL Homeless Veterans Reintegration Program (HVRP) grantees (i.e., Fast Forward), VA facilities, Warrior Transition Units (WTU) and other community based organizations involved with assisting the homeless veterans population etc., direct partnerships have been established where the DVOP will visit the facility weekly (In the case of Fast Forward, a DVOP is scheduled there once a week) to provide services as needed.

The goal is to help the Veteran become job ready and gain employment in a field of their interest and/or ability. Veterans who are identified as having SBE through the initial intake process at the AJC, and need specific individualized career services, will be referred to appropriate DVOP staff for assistance as required. The DVOP and the Veteran will work together to complete a career assessment, and create an Individual Employment Plan (IEP) that works with any current or potential SBEs, then monitor them through the Case Management process. The Veteran would then, if required, be referred to an appropriate partner for additional services as needed. In the absence of DVOP staff, the Regional Manager, or other W/P staff, assumes responsibility for the career assessment of the individual and assures that appropriate referrals and services are provided. DVOPs are a supplement to the AJC staff and should not be a substitute for providing services.

South Carolina will continually monitor and assess the performance data of services provided to ensure that the roles and responsibilities of both the DVOP and the LVER are adhered to and determine if adjustments to the program are needed. The Quarterly Manager's Reports, along with onsite office validations and desk audits, will be used to ensure compliance with this directive and other guidance as given by DOL ETA, VETS, and the DEW.

LVER staff will be placed throughout the state to reach out to employers and promote the benefits of hiring veterans. One way this promotion process can be accomplished is by introducing employers to the immediate tangible benefits such as the Work Opportunity Tax Credit (WOTC) that is available to them when they hire Veterans. In addition to the tangible incentives they can get is the short and long range benefits gained from the intangible "soft skills" Veterans bring to the hiring table, teamwork, trainability, leadership, diversity in the workplace, and a host of others that are inherent to the military experience. By "showcasing" our Veterans, the LVER staff increases job opportunities for them.

Every effort is made to keep vacancies of staff positions down below the 60 day time frame as directed. The Veterans Program Coordinator (VPC) will ensure that the DEW's Department of Human Resources is aware of the unique funding stream of the JVSG and will keep all vacancies filled within the 60 day mandate.

DEW will ensure that all new hires for DVOP and LVER will attend NVTI for mandatory training within the required 18 month time period.

The State Veterans' Program Coordinator (SVPC) will schedule State JVSG Conferences (at least once annually) for all DVOPs and LVERs; DVOPs and LVERs will attend Regional JVSG Conferences and other Regional or State level training opportunities as they become available. These conferences/training opportunities will be paid for using JVSG program funds.

The State Veterans' Program Coordinator and Assistant State Veterans' Coordinator will attend the conferences and training opportunities shown above, plus the Annual HVRP Post Award Conference and other Regional Leadership Conferences as they are scheduled.

The advantage of hiring Veterans is a topic that needs to be presented to an employer on a consistent basis. South Carolina's American Job Centers (AJCs), through the Business Services Team (BST), will provide an effective conduit to promote Veterans to businesses as a sound and wise investment. Federal contractors and subcontractors are also targeted as companies that not only can benefit from the hiring of Veterans, but they are also informed about their responsibilities under the Office of Federal Contract and Compliance Programs (OFCCP) and Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) guidelines as well. This is done through our BST, which includes the Local Veterans' Employment Representative (LVER), the Local Area BST Leads, and Wagner-Peyser (W/P) staff, Local Workforce Development Area (LWDA) staff as well as the South Carolina Department of Employment and Workforce's Communication Department. All provide valuable information about promoting Veterans within a variety of venues including job fair participation, Chamber of Commerce meetings, Society of Human Resource Managers (SHRM) meetings, employer visits, public radio and television service spots and departmental brochures. Besides the benefits of hiring Veterans, employers are also informed about the assistance available to them at the AJC, such as the ability to conduct individual hiring fairs and notification of job opportunities to potential candidates.

Retention of our Veterans who received case managed services is accomplished through follow - up within 30 days of initial hire between the individual Veteran and the employer by our DVOP staff. This gives both parties an opportunity to discuss potential issues before they escalate.

*b. The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;*

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#### Duties Assigned to DVOP Specialists

Primary Duties: Individualized Career Services. The DVOPs are assigned to the local AJC for the main purpose of providing individualized career services to Veterans and others that are eligible with SBEs through case management. This is the key component of the roles and responsibilities of the DVOP.

After the initial assessment of a Veteran in the AJC (Conducted by other than DV/LV staff) and it is determined that they have an SBE and require additional individualized career services, they will be referred to a DVOP for assistance. To accomplish effective individualized career services, the DVOP must, at a minimum:

1. Conduct an assessment of individual needs.
2. Develop an Individual Employment Plan (IEP).
3. Review veteran employment history.

These three activities form the core of an effective individual Case Management plan under which most individualized career services will be delivered.

Upon completion of assessment, the DVOP can determine the need for additional individualized career services through case management. These services can take the form of:

1. Providing vocational guidance and counseling as required, such as; skills assessment, career planning, communications skills, interviewing skills, punctuality, personal maintenance skills and professional conduct.
2. Coordination of supportive services by:
  - a. Providing technical assistance to community – based organizations regarding employment and training services to veterans.
  - b. Developing relationships with VSOs and consulting with other representatives of federal, state, and local programs in order to provide maximum employment assistance.
3. Job referral for specific employment opportunities.
4. Referral to training with other agencies.

The DVOP will provide services to Veterans who have been identified as having an SBE that requires additional enhanced services through case management consistent with VPL's 03-14, Change 1, Change 2 and VPL 03-19. These include: A special disabled or disabled veteran, as those terms are defined in 38 USC §4211(1)(3); A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 USC 11302(a) and (b)), as amended, to include domestic violence and other dangerous or life-threatening conditions affecting permanent residence; A recently-separated service member, as defined in 38 USC §4211(1)(6), who has been unemployed for 27 or more weeks in the previous 12 months; An offender, as defined by the Workforce Innovation and Opportunity Act Section 3(38), who is currently incarcerated or who has been released from incarceration; A veteran lacking a high school diploma or equivalent certificate; or A low-income individual (as defined by WIOA Section 3(36)); Veterans aged 18-24; Vietnam-era Veterans; and Eligible Transitioning Service Members, Spouses, and Family Caregivers. Under the guidance of the WIOA and the integration of all partners

within the AJC, the DVOPS will provide individualized career services under a case management strategy to RESEA, SNAP E&T and TAA veteran clients who have been assessed by AJC partner staff and identified as having SBE.

### Duties of LVER Staff

**Primary Duties:** The LVER will actively advocate for employment and training opportunities with business, industry, and community based organizations on behalf of Veterans consistent with VPL 03-14. LVERs will be assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans and will be part of the "Business Services Team" within the AJC that conduct outreach activities to these entities. The following activities will be part of this program:

1. In conjunction with employers, conduct job searches and workshops and establish job search groups to facilitate the use of the DEW labor exchange system to enhance their employee search activities.
2. Form effective relationships with the business community and trade unions to enhance the availability of employment and training opportunities for Veterans.
  - a. Encourage businesses to hire Veterans and to provide OJT and Apprenticeship programs geared to the Veteran community.
  - b. Maintain current labor market information on trends and adjust strategies accordingly.
3. Work with training providers and credentialing bodies to promote opportunities for Veterans.
  - a. Encourage employers in professions requiring licensure or certification to develop OJT and/or apprenticeship programs for Veterans.
  - b. Promote the participation of Veterans in programs leading to certification or licensure.
  - c. Advocate with training providers and credentialing agencies for recognition of equivalent military training.
4. Plan and participate in job fairs to provide employment opportunities for Veterans. The LVER will facilitate this by:
  - a. Initiating contact and developing relationships with employers, community leaders, labor unions, veterans' organizations, and training program representatives to develop their commitment to providing employment and training opportunities for Veterans.
  - b. Maintaining current information regarding a full range of employment and training options available to Veterans.
5. Work with federal contractors to inform them of the process they can use to recruit and hire Veterans within the DEW Labor Exchange System and discuss their responsibilities under the OFCCP and VEVRAA final rule to attain the appropriate percentage of Veteran hires. The net result of LVER outreach to employers and the community will be an increased awareness of the capabilities of Veterans and their qualifications, along with developing employers' willingness to utilize the OJT program that is available to them to increase the opportunity for Veterans.

*c. The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or American Job Center;*

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**Integration of DVOP specialists and LVER staff**

SCDEW recognizes that all Center staff members are responsible for providing services to veterans and eligible spouses. The DVOPs are integrated into all of South Carolina's 49 American Job Centers. DVOPs are out-stationed full-time at comprehensive centers and satellite offices. DVOPs provide appointment only coverage to satellite offices. Any eligible veteran visiting either comprehensive centers or satellite offices are screened using a Veteran Intake Survey for possible Significant Barriers to Employment (SBE). Veterans are provided career services under 134(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA) by, WIOA, or other partner program staff (e.g., Wagner-Peyser, Trade, RESEA, etc.) to best meet their immediate employment and training needs. Referrals are made when appropriate to DVOP staff using a Veteran Veterans Intake Survey following local customer flows upon identification of an SBE. Partner staff send an electronic version of the Veteran Intake Survey to area assigned DVOP staff when not available on-site. DVOP staff respond and perform follow-up contact as expediently as possible for further assessment either in-person or virtually for services. DVOPs make referrals to center partner programs as necessary for employment and supportive services.

At any point in the process, if a veteran is interested in training services furnished by WIOA, veterans are routed to the appropriate WIOA staff member from JVSG, other partner program staff (e.g., Wagner-Peyser, Trade, RESEA, etc.). WIOA will then conduct assessments for such training services, keeping in mind both veteran Priority of Service requirements and keeping the DVOP or other partner program staff informed of the veteran's progress or outcome for such training service. DVOPs further integrate into the South Carolina workforce delivery system by conducting outreach among comprehensive centers, satellite offices and other community organizations routinely. Through outreach DVOPs establish, collaborate and maintain productive partner relationships through variety of partner meetings, routine communications and events.

LVERs are integrated into each regions business service teams. LVERs routinely attend internal center business service team meetings and co-attend employer meetings where the business service team presents a unified employer workforce approach. In conjunction with local business service teams, LVERs also establishes and maintains effective business relationships with employer groups and attends meetings (e.g. Chambers of Commerce; Workforce Innovation and Opportunity Act [WIOA] Boards) and with community partners (e.g., educational facilities. They assist employers or centers with special recruitment efforts (e.g., makes direct contact to explain programs and services available). In addition, unique local workflows were established to ensure partner collaboration, reduction in duplication and the referrals processes were addressed. SCDEW's JVSG program does not have any consolidated DVOP and LVER positions.

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*d. The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;*

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DEW has elected not to accept the incentive award.

e. *The populations of eligible veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);*

#### **Populations of Veterans to be Served**

Disabled Veterans Outreach Program Specialists (DVOPs) within the South Carolina Department of Employment and Workforce (DEW) will specifically service Veterans within all categories that have been identified as SBEs as defined by VPL's 03-14, Change 1, Change 2 and VPL 03-19. These include

- Veterans with a compensable disability; Homeless (As defined by Section 103(a) of the Stewart B. McKinney Homeless Assistance Act);
- A special disabled or disabled veteran, as those terms are defined in 38 USC §4211(1)(3); special disabled and disabled veterans are those:
  - A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 USC 11302(a) and (b)), as amended, to include domestic violence and other dangerous or life-threatening conditions affecting permanent residence;
  - A recently-separated service member, as defined in 38 USC §4211(1)(6), who has been unemployed for 27 or more weeks in the previous 12 months;
  - An offender, as defined by the Workforce Innovation and Opportunity Act Section 3(38), who is currently incarcerated or who has been released from incarceration;
  - A veteran lacking a high school diploma or equivalent certificate; or
  - A low-income individual (as defined by WIOA Section 3(36)).
- Veterans aged 18-24;
- Vietnam-era Veterans; and
- Eligible Transitioning Service Members, Spouses, and Family Caregivers

DVOPs are required to take an active role in seeking out and assisting these targeted groups by networking with other local, state, and federal government agencies. DVOPs also develop partnerships with Veteran Service Organizations, community service organizations, LWDA partners, faith based organizations, and any other entities that are dedicated to locating and serving Veterans in need and helping them with the purpose of providing individualized career services so they are able to successfully compete in the job market. DEW acknowledges that homeless Veterans are not likely to seek our services on their own and that an "under the bridge" approach is to be taken by DVOPs, encouraging them to go where these individuals can be found. In locations where there is access to organizations such as US DOL Homeless Veterans Reintegration Program (HVRP) grantees (i.e., Fast Forward), VA facilities, etc., direct partnerships have been established where the DVOP will visit the facility weekly (In the case of Fast Forward, a DVOP is scheduled there one day a week) to provide services as needed.

The goal is to help the Veteran become job ready and gain employment in a field of their interest and/or ability. Veterans who are identified as having SBE through the initial intake process at the AJC, and need specific individualized career services, will be referred to appropriate DVOP staff for assistance as required. The DVOP and the Veteran will work together to complete a career assessment and document any current or potential SBEs, then monitor them through the Case Management process. The Veteran

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would then, if required, be referred to an appropriate partner for additional services as needed. In the absence of DVOP staff, the LOFF Manager, or other W/P staff, assumes responsibility for the career assessment of the individual and assures that appropriate referrals and services are provided. DVOPs are a supplement to the AJC staff and should not be a substitute for providing services.

South Carolina will continually monitor and assess the performance data of services provided to ensure that the roles and responsibilities of both the DVOP and the LVER are adhered to and determine if adjustments to the program are needed. The Quarterly Manager's Reports, along with onsite office validations and desk audits, will be used to ensure compliance with this directive and other guidance as given by DOL ETA, VETS, and the DEW.

**f. How the State implements and monitors the administration of priority of service to covered persons;**

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Per Grant Officer Memorandum 01-20, a response to this section is not required.

**g. How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff:**

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**1. Job and job training individualized career services,**

Per Grant Officer Memorandum 01-20, a response to this section is not required.

**2. Employment placement services, and**

The provision of employment, training, and job placement services is addressed under item (a). Per Grant Officer Memorandum 01-20, a response to this section is not required.

**3. Job-driven training and subsequent placement service program for eligible veterans and eligible persons;**

The provision of employment, training, and job placement services is addressed under item (a). Per Grant Officer Memorandum 01-20, a response to this section is not required.

**h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and**

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EMPLOYEE NAME	PROGRAM (DVOP, LVER, OR CONSOLIDATED)	DATE ASSIGNED	COMPLETED ALL REQUIRED TRAINING (YES OR NO)
CUSHMAN, JAMES	LVER	5/1/2018	Y
LANDRY, KHANDI	DVOP	3/2/2020	N
WRIGHT, STEPHAINE	LVER	4/8/2019	N
WILLIAMS, JIMMIE	DVOP	4/8/2019	Y
STOCKTON, SUSAN	DVOP	10/1/2013	Y
THOMPSON, EDWARD	LVER	12/14/2017	Y
OXENDINE, JESSE	DVOP	6/17/2015	Y

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OUTLAW, BERRY	LVER	5/1/2018	Y
GLENN, SHEILA	DVOP	10/1/2013	Y
MOSES, CHARLES	LVER	2/16/2016	Y
HILL, CALVIN	DVOP	2/2/2020	N
HEMPHILL, JOY	DVOP	4/12/2018	Y
CHURCH, JASON	DVOP	2/18/2020	N
BELTON, TONI	LVER	9/1/2016	Y
O'DONNELL, MICHAEL	DVOP	1/19/2010	Y
SAVAGE, FRED	DVOP	4/1/2015	Y
TAYLOR, ALFORD	DVOP	4/3/2017	Y
CARR, MARY	DVOP	9/9/2019	Y
SMALLS, VICTOR	DVOP	10/1/2013	Y
LESTER, RAMONN	LVER	5/29/2018	Y
PIERRE, MARC	DVOP	6/6/2019	N
WILLIAMS, DAVID	DVOP	1/22/2020	N
BRUNS, LAWRENCE	DVOP	12/16/2019	N
HAYWOOD, TYRINE	LVER	1/16/2020	N
BURKE, LYNDY	LVER	7/1/2013	Y
MCABEE, ERIC	LVER	2/17/2010	Y
LEE, JOHN	DVOP	4/26/2010	Y
AGOUDAVI, ABLAM	DVOP	1/9/2020	N
HINTON, RAIFORD	LVER	5/10/2018	Y
DRAYTON, TISHA	LVER	2/24/2020	N
WALKER, MATTHEW	LVER	3/27/2017	Y
CASPER, RHODA	DVOP	12/1/2011	Y
CYNTHIA MOODY	DVOP	7/5/2017	Y
MORETTI, PATRICK A.	DVOP	4/16/1993	Y
BODISON, MARLIN	LVER	12/3/2008	Y
SMITH, DAVID	LVER	12/1/2015	Y

*i. Such additional information as the Secretary may require.*

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Per Grant Officer Memorandum 01-20, a response to this section is not required

# PERFORMANCE INDICATOR APPENDIX

## All WIOA Core Programs

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Expected levels of performance are outlined in the Performance Indicator Appendix following each individual core program plan.

PERFORMANCE INDICATORS	PY 2020 EXPECTED LEVEL	PY 2020 NEGOTIATED LEVEL	PY 2021 EXPECTED LEVEL	PY 2021 NEGOTIATED LEVEL
EFFECTIVENESS IN SERVING EMPLOYERS	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

## Additional Indicators of Performance

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

### ADDITIONAL INDICATORS OF PERFORMANCE

Not applicable.

## **OTHER APPENDICES**

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Not applicable.